

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:25-CV-20757-JB/TORRES

JANE DOE,

Miami, Florida

Plaintiff,

June 3, 2025

vs.

Steven Bonnell II,

Defendant.

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HEARING

TRANSCRIBED FROM DIGITAL AUDIO RECORDING
BEFORE THE HONORABLE EDWIN G. TORRES
UNITED STATES MAGISTRATE JUDGE

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1 The following proceedings were held:

2 THE DEPUTY CLERK: The United States District Court is
3 now in session. The Honorable Edwin G. Torres presiding.
4 Calling case Doe/Bonnell, Case Number 25-20757, civil, Becerra.

5 Counsel, please state your appearance starting with
6 the Plaintiff.

7 MR. LAGE: Good morning, Your Honor. Gus Lage, Carlos
8 Garcia Perez, law clerk Ms. Garcia, and the Plaintiff,
9 Jane Doe, present.

10 MR. RASKOPF: Good morning, Your Honor. Bob Raskopf
11 from the Bilzin Sumberg firm, along with my colleague
12 Patricia Patino, and our lead counsel from Los Angeles is
13 Andrew Brettler from Berk Brettler.

14 MR. BRETTLER: Good morning, Your Honor.
15 Andrew Brettler from Berk Brettler. We're also joined by
16 Mr. Bonnell, our client.

17 THE COURT: Good morning. Everybody have a seat.

18 This is a preliminary injunction hearing that was
19 referred to me for disposition by Judge Becerra. I took a look
20 at it and decided that I couldn't resolve it without probably
21 hearing additional evidence or response from the parties, so
22 that's why I scheduled the hearing when I did. So I appreciate
23 everybody's cooperation. I think I scheduled it on Friday,
24 short notice. So, I appreciate everybody accommodating it to
25 get the matter resolved.

1 So let me turn to counsel for the Plaintiff and tell
2 me what witnesses, if any, you wish to call.

3 MR. LAGE: Your Honor, at this time, if Your Honor
4 needs us to get further information, we would call the
5 Plaintiff, and we would also call the Defendant.

6 THE COURT: Okay. On behalf of the Defendant?

7 MR. BRETTLER: We would call the Defendant,
8 Your Honor.

9 THE COURT: Okay.

10 So why don't we do that. Why don't we take the -- we
11 don't have to take all day for it just because I've already
12 reviewed the affidavit you filed in support and the
13 declarations and the supplemental declarations, but I think it
14 would be useful to get some of that information clarified on
15 the record. So, go ahead and call then -- let you call -- let
16 you direct your client.

17 MR. LAGE: Your Honor, in order to make this as
18 efficient as possible, if there's areas of inquiry that you
19 wish us to address, I'm happy to do so.

20 THE COURT: In particular, I guess the issue is -- one
21 of the issues that I have is when did -- when did she become
22 aware of the problem, and what occurred in the interim between
23 that awareness and when the lawsuit was filed.

24 MR. LAGE: Very well, Your Honor. At this time we
25 would call Jane Doe to the stand.

THE COURT: Okay.

THE DEPUTY CLERK: Please state your full name and
spell your last name for the record, please.

MR. LAGE: Your Honor, for purposes of confidentiality, can we continue to refer to her as Jane Doe?

THE COURT: Yes, for purposes of the hearing, that's fine.

MR. LAGE: Very well, thank you.

THE WITNESS: Sorry to clarify, do I say my real name now?

THE COURT: No, the court reporter will know.

THE WITNESS: Jane Doe.

THE COURT: Thank you.

Thereupon:

JANE DOE,

having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY MR. LAGE:

Q. Ms. Doe, do you know the Defendant?

A. Yes.

Q. And how is it that you know the Defendant?

A. He was my friend for around five to six years.

Q. Okay. Where is it that you first met the Defendant?

A. I first met him in Florida, but I knew about him online.

1 beforehand. We had a couple of debates and conversations
2 privately.

3 Q. When we're speaking about the Defendant, who is the
4 Defendant?

5 A. Steven Kenneth Bonnell, Destiny.

6 Q. Okay. Can you point him out for us, please?

7 A. Yeah.

8 Q. The individual with the blue suit, brown hair?

9 A. Yes.

10 Q. As a result of your conversations with Mr. Bonnell, did you
11 at some point have an intimate relationship with Mr. Bonnell?

12 A. Yes.

13 Q. All right. Was that -- where did that intimate rendezvous
14 take place?

15 A. In Miami, Florida.

16 Q. And what was the date of that rendezvous?

17 A. I believe it was around September.

18 Q. Of what year?

19 A. 2020 or 2021. It's . . .

20 Q. Leading up to --

21 THE COURT: When did you first meet or talk with
22 Mr. Bonnell?

23 THE WITNESS: I talked to him, I started around 2020.
24 It was -- I had just transferred universities, and I was, like,
25 lonely, so I was like, I'm going to livestream and see if I can

1 make friends that way. And because my family is inherently
2 very political, I started talking politics and then connected
3 with Bonnell.

4 BY MR. LAGE:

5 Q. Leading up to your intimate rendezvous with Mr. Bonnell,
6 had you had conversations or messaging in relation to that
7 upcoming rendezvous?

8 A. Yeah, we talked about it beforehand. We had a lot of
9 conversations about consent and the importance of consent. I
10 was not super sexually experienced, so I was very afraid of,
11 like, accidentally leading somebody on or getting sexually
12 assaulted, so we -- we had a bunch of conversations about
13 consent beforehand.

14 Q. Well, when you say that you had conversations about
15 consent, did you have conversations about consent relating to
16 dissemination of information relating to your rendezvous?

17 A. Well, I told him ahead of time that I wanted to keep things
18 really private, I didn't want people in general to know about
19 our sexual encounter, that I didn't want that information to
20 be, like, out in public, stuff like that.

21 Q. Why?

22 A. His community -- and not just his community, but to be
23 fair, the Internet can be, like, a really vicious place, and I
24 didn't want people to claim that, like, oh, he was only being
25 nice to me because he was, like -- he wanted to sleep with me.

1 Because we would debate online politically, so we would go back
2 and forth on subjects. And I didn't want people to just claim,
3 like, oh, no, you know, he's just being nice to you for that,
4 instead of, like, evaluating my arguments on the merits of what
5 they are.

6 THE COURT: Now, what do you mean about his community?

7 THE WITNESS: He's a livestreamer, so he has a large
8 platform of a lot of followers. They refer themselves as DGG.

9 THE COURT: As what?

10 THE WITNESS: DGG, that's their community name.

11 THE COURT: DGG?

12 THE WITNESS: Yes.

13 And they're people who follow him, who really agree
14 with his ideas, think he's, like, super cool, and, yeah, try to
15 support him and his endeavors.

16 BY MR. LAGE:

17 Q. Well, when we're talking about the size of that community,
18 how big is the community that follows Mr. Bonnell?

19 A. Well, he has over 840,000 subscribers on YouTube, and
20 that's just one of his platforms.

21 Q. How many platforms is Mr. Bonnell on that you're aware of?

22 A. He's on Kick, Instagram, YouTube, and I think he's doing
23 TikTok as well.

24 Q. Do you have any knowledge as to whether streaming is the
25 main source of revenue for Mr. Bonnell?

1 A. Yeah, I'm under the impression that live streaming is his
2 main source of revenue.

3 Q. Now, what happened at the encounter? Was it recorded?

4 A. Parts of it were recorded, so it wasn't the entire thing.
5 There were, like, a couple of small videos that were recorded.

6 Q. Did you allow him to record it?

7 A. Yeah.

8 Q. All right.

9 Did you have conversations about what he could do with
10 those recordings?

11 A. Yeah.

12 Q. And what were those conversations about?

13 A. Well, I told him when, like, we did it, like, you know,
14 like, don't send this around people, you know. Like, this is,
15 like, private. Yeah.

16 Q. And what did he tell you?

17 THE COURT: Why would you allow him to record you?

18 THE WITNESS: So, we were talking about it, like,
19 ahead of time, mentioned it, like, that could be something that
20 was, like, hot, I guess, I don't know. I mentioned, what is
21 it, wanting to show it to the -- this is so embarrassing to
22 talk about. I'm so sorry. Give me a second. I remember I --
23 I told him, like, oh, like -- like, oh, when it came to, like,
24 the sharing, like, oh, is it, like -- sorry, I'm like . . .

25 To show it to, like, the person that I was, like,

1 currently in love with and stuff like that. He even expressed,
2 Like, oh, what if that person, like, shares it around?

3 And I was like, Oh, no, like, don't worry, like, we'll
4 make sure that it's, like, very limited. Like, it could just
5 be my face. I trusted that he wouldn't send it around because
6 we had so many conversations about consent and how I didn't
7 want anybody else to know that we were sexual. You know, I --
8 it was a stupid decision. Looking back at it, it was very dumb
9 of me to do, but I was also I believe 20 around the time. I
10 only had one partner before him. And I really just -- like, I
11 thought I could trust him. I thought, okay, this will -- this
12 isn't going to spread around. He's not going to do anything
13 like that. We literally talked about this for hours before
14 about consent and the importance. So, I just thought that it
15 was, like, safe, and that it would be okay, and that was dumb.

16 THE COURT: Apart from your encounter, had you ever
17 seen anything on his, what do you call them, livestreams or
18 streams that was sexual in nature?

19 THE WITNESS: He did talk about, like, personal
20 relationships before. So this is another thing. He was in an
21 open relationship with his partner Melina at the time. And he
22 had -- like, he would talk on stream about, like, the
23 importance of, like, boundaries and consent. And, you know,
24 how you have to, like, listen to your partners and, you know,
25 be aware and smart about that stuff.

1 So -- and he also presents himself as, like, you know,
2 leftist, liberal, like, cares about women's rights, thinks that
3 those things are important, respecting women. So, all that
4 information I had to the time where I made that decision was,
5 Oh, this guy really respects women, he really cares about
6 consent, he really -- you know, he's very aware sexually about
7 boundaries and stuff like that. Like, there's no way that he
8 is going to betray all those values. Like, that's kind of a
9 mean thing to do such a thing. So, that's what my impression
10 was at the time.

11 BY MR. LAGE:

12 Q. Had he ever made any commentaries prior to your encounter
13 about -- indicating that the posting of explicit materials is
14 one of the worst things that you could do to someone?

15 A. He definitely said that on the stream. I don't think that
16 was before the encounter, but that was after the encounter. He
17 had livestreams where, you know, these topics would come up,
18 because he's a political livestreamer, so the topic would come
19 up about, Oh, what do you think about consent and doing this or
20 that? And he did indicate on one of those livestreams that
21 that's one of the worst things you could possibly do to
22 someone.

23 MR. BRETTLER: Objection, Your Honor, hearsay.

24 A. It's not --

25 THE COURT: I will decide if it's hearsay. It's

1 overruled.

2 BY MR. LAGE:

3 Q. So, Ms. Doe, at some point was any of the content from your
4 encounter, sexual encounter with Mr. Bonnell circulated, to
5 your knowledge?

6 A. Like publicly or?

7 Q. Well, how -- was it ever circulated in any fashion?

8 A. I sent it to my previous partner, and that was it.

9 Q. Was there consent from Mr. Bonnell?

10 THE COURT: What do you mean? I'm sorry, I
11 misunderstood what your answer was.

12 THE WITNESS: My previous partner. My previous
13 boyfriend, the one that earlier I mentioned when I was -- did
14 the encounter with Bonnell, I was, like, oh, can I send it to
15 the person that I'm, like, currently, you know, in love with?
16 That was -- that would be the only person who would, like . . .

17 THE COURT: So, did you send it or did he send it?

18 THE WITNESS: I sent it or showed it to my previous
19 partner.

20 THE COURT: And how did you get a copy of this?

21 THE WITNESS: He sent it to my phone.

22 THE COURT: He sent a video to your phone?

23 THE WITNESS: Yes.

24 THE COURT: And then you forwarded it?

25 THE WITNESS: Yes.

1 THE COURT: Okay.

2 BY MR. LAGE:

3 Q. Was that with Mr. Bonnell's consent?

4 A. Yes.

5 Q. All right. Did there come a time that Mr. Bonnell
6 disseminated your video to any other individuals without your
7 consent?

8 A. Yes.

9 Q. All right. And when did he do that?

10 A. He apparently did this on multiple occasions.

11 Unfortunately, there's, like, contention around, like, the
12 exact date when he sent it to Rose. I thought it was
13 October 4th, but it could -- of 2022. They're saying it was
14 April 4th, 2022, or something along the lines, I'm not sure.

15 THE COURT: We'll back up a step. When did you first
16 learn of him transmitting anything?

17 THE WITNESS: Oh, I learned that on the day after
18 Thanksgiving, November 28th of 2024.

19 THE COURT: Okay. And how did you learn it?

20 THE WITNESS: Because one of the people that he sent
21 it to decided to publish my video and the video of multiple
22 other partners to a website he called Kiwi Farms, and that
23 website is known for also doxing and harassing people. And --

24 THE COURT: And how did you learn of this?

25 THE WITNESS: Because I started getting messages from

1 a whole bunch of people and random strangers and DMs and people
2 started posting under my social media pictures of the video
3 and, like, then telling me, like, oh, you just got exposed, to
4 like, oh, I hope you know this, but your Destiny video got
5 leaked out. Oh my God, like, yeah.

6 THE COURT: Okay.

7 BY MR. LAGE:

8 Q. So, that was in November of 2022 when you first found out?

9 A. Yes -- no, sorry, 2024.

10 THE COURT: '24, you said?

11 THE WITNESS: Yes, November 2024 is when I first found
12 out that the video had been publicly disseminated.

13 BY MR. LAGE:

14 Q. There's the -- who is Rose?

15 A. I wish I could tell you. I wish I knew who she was. I
16 don't even know if the Defendant knows who she is exactly
17 because it doesn't seem like they ever met in real life.

18 According to, like, the messages online, it seems like she was
19 a 19-year-old girl, but he never verified her age, to my
20 understanding. So the hacker who took control of the account
21 or whatever claims that she was 17 at the time that they
22 started sexting and corresponding.

23 Yeah, and that's kind of all I know about her. I just
24 know that he never actually met her, and we don't actually know
25 her age.

1 Q. As this issue has progressed, did you come to learn whether
2 or not Mr. Bonnell had continued to share that explicit
3 encounter without your consent?

4 A. Yes.

5 Q. What other occasions are you aware of that he shared it
6 with other individuals without your consent?

7 A. After I spoke about this issue and what was happening, I
8 found out that the Abby MC apparently received a video of me in
9 2023. I also -- I got a couple of messages as well of people
10 who said that they think that they received a video of me. One
11 of those people said that they think that their sister received
12 a video of me or that the sister recognized me from a video
13 just a few months ago, but, unfortunately, some of these people
14 have deleted their accounts.

15 MR. BRETTLER: Objection, Your Honor, lacks
16 foundation, also contains hearsay testimony.

17 MR. LAGE: It goes to state of mind, Judge, and this
18 hearsay is admissible in this type of hearing.

19 THE COURT: Well, I'm not admitting it for the truth.
20 It's just for her perception at the time.

21 And when did you learn of this second distribution?

22 THE WITNESS: The Abby or the person who said the
23 sister?

24 THE COURT: The first one of those.

25 THE WITNESS: It was after January 20th. After I --

1 after the Substack was posted, that's when I started receiving
2 people -- or a few months after that.

3 BY MR. LAGE:

4 Q. After you initially found out after Thanksgiving that this
5 video had been uploaded to Kiwi Farms, did you make efforts to
6 contact Mr. Bonnell?

7 A. Yeah, I basically -- because I know that there was more
8 than one video in that encounter. Like, I asked him if he sent
9 anything more to other people. I was really paranoid,
10 essentially, for the next few days that something else would
11 come up that I wouldn't know about.

12 THE COURT: When was this conversation?

13 THE WITNESS: It was the day of the -- that I found
14 out about the leaks, I texted him immediately. I was, like:
15 What's going on? Did you send this to anybody else? Like, how
16 many other people are -- or is there anything else that I
17 should be prepared for, basically.

18 THE COURT: This is in November 2024?

19 THE WITNESS: Yes.

20 BY MR. LAGE:

21 Q. What did Mr. Bonnell respond to you?

22 A. He said something along the lines of, I'm so sorry.
23 There's literally no excuse. I was fairly close to this
24 person, if it makes you feel any better. Literally no excuse.
25 I'm so sorry.

1 Q. However, after that date, he continued disseminating?

2 A. I will argue that, yes. Um . . .

3 MR. BRETTLER: Objection, calls for speculation.

4 THE COURT: Sustained as to form.

5 BY MR. LAGE:

6 Q. Okay. So that discussion took place in, when,
7 November 2024, correct?

8 A. Yeah, November 28th of 2024.

9 Q. All right.

10 And the other individual who says that their sister
11 received it, received it approximately how long before
12 January 20th, 2025?

13 A. They said a few months before. They said, like, two to
14 three months before. Something along those lines.

15 Q. And even after disseminating it to Rose, he had continued
16 disseminating it thereafter, correct?

17 A. Yes.

18 Q. All right. Did at any time Mr. -- did Mr. Bonnell have a
19 hyperlink to Kiwi Farms and the video?

20 MR. BRETTLER: Objection, vague and ambiguous.

21 THE COURT: Overruled.

22 You can answer.

23 A. By hyperlink, do you mean, like, sending his followers
24 there or?

25

1 BY MR. LAGE:

2 Q. Correct.

3 A. He -- there was a Twitter post where he directly told
4 everybody that they could still find the material on
5 Kiwi Farms. So he did tell everybody, like, go to this
6 website, find this material, basically.

7 Q. When did he do that?

8 A. He did that I think around February 20th. I'm not sure of
9 the exact date, but I think it was around February.

10 THE COURT: Of 2025?

11 THE WITNESS: Yes.

12 THE COURT: Now, prior to November 2024, had you
13 maintained a relationship with him?

14 THE WITNESS: Prior, yeah, we were friends. I -- he
15 had this live election stream for the -- yeah, livestream for
16 the election, and I was there. We collaborated in kind of the
17 same projects with his community. Yeah, we were -- we were
18 friends.

19 BY MR. LAGE:

20 Q. How has the dissemination of this video impacted you
21 personally?

22 A. There's various stages to this. When the video first came
23 out, I basically could not sleep. I had a lot of trouble
24 sleeping at night. I was super anxious all the time. I was
25 just waiting for somebody to, like, tell my parents or my

1 family what happened. I would be crying constantly. I was
2 super depressed. I was in a really bad state of mind, and at
3 the time I -- one of my friends was like, oh, maybe you should,
4 like, try to seek legal justice because that seems to be, like,
5 something that's, like, really big on your mind.

6 So I tried doing that, and then I was told that there
7 was no guarantee of Jane Doe status, and that if I didn't
8 receive that, good luck, you know, people are going to harass
9 my family potentially more or my -- you know.

10 So, I -- and I'm not saying that this was right or
11 okay, but that's what my mindset was at the time, I was -- the
12 original plan was basically for me to commit suicide and
13 schedule a note for after I died detailing what Steven had done
14 and hoping that everybody would forever know what he did and be
15 able to stay away from him and be able to be more wary and
16 cautious.

17 And it was only after, essentially, being on, like,
18 suicide watch with my friends -- I'm very lucky to have the
19 friends that I have that were constantly checking on me every
20 day and making sure I was okay and, you know, basically
21 convincing me, hey, don't do anything rash. At least do your
22 best legally first and then if that doesn't work out, you can
23 figure it out later, but just try this option first before the
24 life-ending one. That's when I decided, okay, I'm going to try
25 my best to go through that route first and see what I can

1 handle and everything.

2 Q. Do you still receive, or are you still the subject of
3 derogatory posts on social media as a result of this encounter
4 with Mr. Bonnell?

5 A. Oh, absolutely, although I will say that most of it is from
6 Mr. Bonnell's community now. Not very good.

7 Q. How has that impacted you?

8 A. I have, like, thousands of people online believing that I
9 am -- was -- that I was not serious about suicide. I have
10 thousands of people online saying that I was, like, a liar, and
11 that I am lying about this case continuously, even though I
12 would argue the opposite actually holds true. Obviously, the
13 general feelings, like depression and anxiety, and I fear like
14 going outside. But I think the biggest one, like -- I don't
15 know, I still struggle with the suicidal thoughts sometimes.
16 I'm getting help mentally professionally, but what I see, like,
17 thousands of people basically claiming that I'm lying about how
18 I feel, and that I wasn't actually serious, like, yeah, there
19 is a little part of my brain that is like, maybe I should end
20 it and stop the pain that I feel and just show everybody that I
21 wasn't lying and that I am (unintelligible) and this is not
22 okay.

23 Q. Do you need a second? Would you like some water?

24 A. Yeah, please. One second.

25 MR. LAGE: We'll get you some water, Ms. Doe.

1 Are you okay to continue?

2 THE WITNESS: Can I have like one minute, please?

3 MR. LAGE: Your Honor, would you mind giving her a
4 break?

5 THE COURT: You can take a five-minute break.

6 THE WITNESS: Thank you.

7 BY MR. LAGE:

8 Q. Ms. Doe, are you ready to proceed?

9 A. Yeah.

10 Q. Did you have to have discussion with your family about the
11 uploading of this video?

12 A. Yeah.

13 Q. What was that conversation like?

14 A. Oh my gosh, I just got out it. I'm, like -- okay, sorry.

15 My --

16 THE COURT: Well, let me ask you this question: Did
17 they know about your relationship with the Defendant?

18 (No audible response.)

19 THE COURT: Okay. And who all -- did other people
20 know?

21 THE WITNESS: Only -- there should have been only two
22 people who should have known, my ex-boyfriend and Steven's
23 ex-wife, Melina. And to be clear, I told -- like, I told him
24 he could tell her, but I didn't say anything about showing her
25 anything, but those were the only two people who should have.

1 THE COURT: Now, let me ask you this question: Have
2 you -- you said you originally met him through online. Have
3 you yourself had an online profile before?

4 THE WITNESS: At the first time, I just started. I
5 was -- I transferred universities, and it was a very big
6 change. I didn't have a lot of, like, friends in my new
7 university. So I was, like, okay, like, I have a camera, I
8 have a computer. Maybe I can try making friends this way,
9 like, online, just livestreaming, talking, see who I connect
10 with.

11 THE COURT: When was this?

12 THE WITNESS: It was around '19 or '20, so it was
13 around, like, 2019 to 2020, like, around there.

14 THE COURT: Okay. And what university were you going
15 to at the time?

16 THE WITNESS: I just trans- -- I went to -- I was
17 going to Fordham University, but I just transferred to
18 University of Florida. Gators.

19 THE COURT: So you began engaging in online social
20 media accounts, things of that nature?

21 THE WITNESS: Yeah, I just started, kind of, I just --
22 kind of leaned into politics. I was like, these are the topics
23 that I care about, that I think are important. And then people
24 were like, those are important, or no, you're so wrong about
25 this.

1 THE COURT: Did you ever introduce your personal life
2 into any one of your videos or your posts?

3 THE WITNESS: Not really, no. I mean, the only thing
4 I would talk about that would be somewhat personal would be,
5 oh, you know, things relating to, like, mental health and the
6 importance of it, and, like, how, you know, I think it's not
7 something talked about enough in society. But I wouldn't tell
8 people, like, this is the university I'm going to or, like,
9 these are -- yeah, my name. I made sure I would not say that,
10 keep it super private because I know that with that
11 information, like, people can do a lot of damage.

12 THE COURT: I was going to ask you that question,
13 actually. Did you post or submit things under your own name or
14 under a moniker?

15 THE WITNESS: Generally speaking, if not every
16 single -- like, all social media accounts, Pxie, Pxie, Pxie. I
17 didn't want people, yeah, to know my real name, period.

18 THE COURT: Okay. So back to counsel's question about
19 you telling your family about your encounter with
20 the Defendant.

21 THE WITNESS: Yeah. So, basically the way that
22 conversation went is my dad told me that he was disappointed at
23 me. Like, he was disappointed. And then I kind of had to stop
24 him there and tell him, please, don't say anything else because
25 I promise you there is -- there's nothing that you can say that

1 I haven't already thought of or have told myself. So, yeah.
2 So that's kind of, like, how the conversation went. After that
3 my -- my parents softened a little bit, because I think they
4 could see that I was not in the best mental state. But, yeah,
5 it was -- it was really embarrassing.

6 BY MR. LAGE:

7 Q. Going back to an earlier topic, you mentioned Kiwi Farms.
8 After Mr. Bonnell directed his followers to the content back on
9 Kiwi Farms, are you aware of how many people viewed it or how
10 many people accessed that site?

11 MR. BRETTLER: Objection, calls for speculation.

12 MR. LAGE: If she knows.

13 THE COURT: I'll sustain based on lack of foundation.

14 MR. LAGE: All right.

15 BY MR. LAGE:

16 Q. Did you at any time go back to Kiwi Farms to determine
17 whether or not how many views that video had obtained in a
18 certain period of time?

19 MR. BRETTLER: The same objection, Your Honor.

20 THE COURT: You haven't established a predicate.

21 Let me -- did you -- when were you first alerted that
22 there might have been a posting or an uploading on -- what is
23 Kiwi Farms, like another Instagram kind of thing?

24 THE WITNESS: It's like a website. It's an online
25 forum.

1 THE COURT: Okay.

2 THE WITNESS: Basically a bunch of people anonymously
3 post there. Usually they have threads targeting individuals
4 to, like, harass and dox them. And Destiny has his own thread
5 of people there posting negative information about him.

6 THE COURT: Okay.

7 THE WITNESS: And he was aware that this website
8 existed, and he was also aware there was a thread about him.
9 And the only reason I bring that up is because it's insane to
10 me that, you know, that you have, like, a dedicated group of
11 people who just want to harm you or are trying to find out
12 every single bit of your personal life, and that you're just
13 disseminating out pornographic content of others without
14 consent, privately, whatever, knowing that these group of
15 people exist out there, but that's a side note.

16 I first found out on November 28th where basically the
17 same day, essentially. That's when everybody was, like, oh,
18 Kiwi Farms has your stuff, Kiwi Farms has your stuff,
19 Kiwi Farms has your stuff.

20 THE COURT: So it was contemporaneous with you finding
21 out the first time?

22 THE WITNESS: Yes.

23 THE COURT: Got it.

24 THE WITNESS: I do want to note that the website
25 gained so much traction that it crashed repeatedly, to my

1 understanding, to my knowledge.

2 MR. BRETTLER: Move to strike, Your Honor. Lacks
3 foundation.

4 BY MR. LAGE:

5 Q. How is it that you know that?

6 A. I know that because the owner of the website made a public
7 posting saying Destiny's BJ video is getting so many views that
8 the website crashed.

9 THE COURT: Where was that posted?

10 THE WITNESS: That was posted on Twitter.

11 THE COURT: So you found out about the Kiwi Farms
12 connection on November 28th?

13 THE WITNESS: Yeah.

14 BY MR. LAGE:

15 Q. When was the posting by the owner of the site?

16 A. About it being crashed?

17 Q. Yes.

18 A. It was a few days after. I can't recall the exact date. I
19 just remember seeing it a few days after, and being, like, oh
20 my God, everybody knows.

21 Q. Are you familiar with a Google Drive that Mr. Bonnell has
22 with this explicit video of your encounter with him?

23 MR. BRETTLER: Objection, lacks foundation.

24 THE COURT: Overruled.

25 A. So I know he had -- and I know Abby said that she received

1 an explicit material of me through the Google Drive. I know he
2 had a Google Drive or apparently he would upload a bunch of
3 other people's, including him, but, like, pornographic content
4 without their --

5 THE COURT: How do you know this?

6 THE WITNESS: I know this because the leaker -- well,
7 I know this for a couple of reasons. I know this because the
8 leaker posted messages where Destiny is sending Google Drive
9 links to Rose, to the girl. So there's messages of Destiny
10 being like, oh, if you want to see this video, here's a Drive
11 link, here's a link, here's a link.

12 THE COURT: And you got that from who, Rose?

13 THE WITNESS: Yeah, from -- yeah, the person who took
14 control of Rose's account leaked all the messages between
15 Destiny and her, and that's included there. I also know this
16 because multiple women afterwards came out and told me: Oh, I
17 received pornographic content about other people and now I
18 realize that content was probably without consent using these
19 links. And I know that because Destiny himself has stated --
20 and at that time I thought anything he uploaded there was with
21 the consent of other people, but now I realize that's not the
22 case. Early on he sent me a Google Drive link or mentioned
23 one. So, yeah, so those are the ways I found out.

24 THE COURT: So when is the first time you found out
25 about the Google Drive link?

1 THE WITNESS: I can't remember the exact date because
2 he deleted all of our messages, but I do remember he sent me
3 one of Melina, like, a file with Melina through the Google
4 Drive. And I assumed, like, okay, like, you know, he's sending
5 me this, whatever.

6 THE COURT: And when was that?

7 THE WITNESS: When was that? That was before I think
8 our first sexual encounter, but I honestly can't recall the
9 exact date.

10 BY MR. LAGE:

11 Q. And Melina was who?

12 A. His ex-wife.

13 THE COURT: So he sent you a video of his ex-wife
14 before your encounter with him?

15 THE WITNESS: From my memory and recollection.

16 THE COURT: Didn't that give you pause then to allow
17 him to tape you?

18 THE WITNESS: No, because I thought, like, Melina, the
19 way that she was also described to me and my understanding of
20 her was that her and Steven were in a super sexually liberated
21 relationship, that they were, like, super open with each other,
22 and that they were super open about sex, and, you know, that
23 they didn't really, like, care about that stuff, but that they
24 were also very respectful about boundaries because open
25 relationships can't work without the proper set of boundaries

1 and understanding.

2 THE COURT: And you got this information from who?

3 THE WITNESS: Steven.

4 THE COURT: Okay.

5 THE WITNESS: So I was -- and again, like, the only
6 person I was with before Steven was my former boyfriend, so I
7 just thought, like, oh, you know, this is just something I
8 don't have a lot of knowledge on, but he seems very experienced
9 and understanding, and we've had so many of these conversations
10 about consent. Like, yeah, I was just under that impression
11 that everything was going to be consensual.

12 BY MR. LAGE:

13 Q. Did Mr. Bonnell ever state to you that he was going to make
14 efforts to take down the videos from Kiwi Farms?

15 A. Yeah, he said that he hired a legal firm to aid him in
16 that, yeah.

17 BY MR. LAGE:

18 Q. To your knowledge, do the videos still exist on Kiwi Farms?

19 A. I believe so.

20 Q. Okay. And during the course of the pendency of this case,
21 has Mr. Bonnell dodged you by attempting to publish your name
22 on any of his streams?

23 A. Yes.

24 Q. And how did he do that?

25 A. I think it was the 19th of February. Even though he

1 never -- even in real life, he did not call me by my real name.
2 He called me Pxie because that's an effort I went to when it
3 came to my streaming friends or my content-creator friends.
4 Like, refer to me as Pxie, Pxie, Pxie. That's how rarely I use
5 my name. Even -- whenever.

6 He referred to me for the first time ever as my real
7 name.

8 THE COURT: And when was this?

9 THE WITNESS: This was I believe February 19th and
10 20th. Like, he uploaded another video in another channel
11 called last night on Destiny or whatever on the 20th, but I
12 believe his livestream was the 19th.

13 BY MR. LAGE:

14 Q. Okay. The video that was shared of you, did it include a
15 depiction of intimate sexual content that you were involved in?

16 A. Yes. Wait, sorry, can you repeat that question? I think
17 I --

18 Q. Yes.

19 Did the video that was shared by Mr. Bonnell of you
20 and him involve intimate sexual content?

21 A. Yes.

22 Q. All right. The -- you indicated that it was also shared
23 with Ms. Mac without -- Abby Mac without your consent. Do you
24 know if Abby Mac was outside the State of Florida?

25 A. Yeah, she lives outside the State of Florida.

1 Q. Do you know what state she lives in?

2 A. I can't remember off the top of my head right now.

3 Q. Are you sure that it's outside the State of Florida?

4 A. Yeah, I'm sure. I think she just moved out of Texas,
5 that's why I'm not sure exactly what state. But we've had
6 conversations before where I know a hundred percent she's not
7 in Florida.

8 Q. At the time that the video was shared with her by
9 Mr. Bonnell, do you know if she was living in Texas?

10 A. I think so because I think she was -- but I can't say for
11 sure.

12 MR. BRETTLER: Objection, calls for speculation and it
13 lacks relevance.

14 THE COURT: Overruled.

15 She doesn't know, bottom line, is the answer.

16 BY MR. LAGE:

17 Q. Did you consent to the disclosure of the video at any time
18 to Mr. Bonnell?

19 A. Disclose, like, Mr. Bonnell to send the video to other
20 people?

21 Q. Correct.

22 A. Not, no.

23 MR. LAGE: Okay. I don't have any further questions
24 at this time, Your Honor. Thank you very much.

25 THE COURT: Thank you.

1 Cross-examination?

2 MR. BRETTLER: Thank you, Your Honor.

3 CROSS-EXAMINATION

4 BY MR. BRETTLER:

5 Q. Good morning, Ms. Doe.

6 A. Good morning.

7 Q. When you first started communicating with Mr. Bonnell
8 online, you quickly --

9 THE COURT: Since we don't have a reporter, introduce
10 yourself for the microphone for me.

11 MR. BRETTLER: I'm sorry. I'm Andrew Brettler. I
12 represent the Defendant Steven Bonnell. Berk Brettler LLP in
13 Los Angeles.

14 BY MR. BRETTLER:

15 Q. Ms. Doe, when you first started communicating with
16 Mr. Bonnell online, your conversation turned sexual at a pretty
17 early point in your relationship, correct?

18 A. I don't think so, I think it was a couple of months. Maybe
19 you guys have the messages. He deleted all of mine, so I can't
20 say 100 percent for sure, but I don't think it was pretty
21 quick.

22 Q. On March 17th, 2020, at five o'clock in the morning, you
23 sent a message to Mr. Bonnell stating: I took some videos with
24 a guy I can send you later if you're interested, also.

25 Do you recall sending that message to Mr. Bonnell?

1 A. I don't recall, but I assume -- I'm going to assume that
2 that message exists.

3 Q. And in response, Mr. Bonnell said: Yes.

4 At 5:01 a.m. you wrote: Okay, I'll send them to you
5 when I get home, happy face, heart.

6 Do you recall sending that message?

7 A. I don't recall, but I assume it exists.

8 THE COURT: You don't recall sending him a video of
9 somebody else?

10 THE WITNESS: I recall my former boyfriend, who I
11 would refer to as that guy, the guy, a guy, didn't want me to
12 send videos of us, like, experimenting and stuff like that. I
13 just don't -- I can't verify, like, the specificity of the
14 message because I don't have those messages.

15 THE COURT: Do you remember sending him of a video of
16 some sexual encounter?

17 THE WITNESS: Yes.

18 MR. BRETTLER: And I'm also getting there, Your Honor.
19 BY MR. BRETTLER:

20 Q. Mr. Bonnell offered to send you videos of him and his wife
21 if you wanted them; do you recall that?

22 A. Yes.

23 Q. Do you recall responding at 5:03 a.m. on March 17th, 2020:
24 I'm open to anything you want to send me. You know I'm a super
25 curious person. I think he is asleep, so you might have to

1 wait for my videos until tomorrow.

2 Do you recall sending that message?

3 A. Again, I can't say specifics, but I'll assume yes.

4 Q. Do you recall asking Mr. Bonnell: Is there any particular
5 photo or position you'd want to see me in?

6 A. I assume that message exists, but I'm a little bit confused
7 about what this line of questioning -- like . . .

8 Q. Do you recall saying to Mr. Bonnell: I'm with my guy
9 friend right now. I can probably get a photo of me sucking him
10 off, if you think that would be hot.

11 A. I assume that message exists, but I don't know if I'm
12 overstepping my boundaries here or whatever. What does that
13 have to do with Mr. Bonnell sending my video to other people
14 that I didn't know?

15 Q. Ms. Doe, do you recall on January 3rd of this year,
16 January 3rd of 2025, where you posted online: I have never
17 sent videos of other people to Steven, ever?

18 A. One, I remember sending that to Dan Saltman in a private
19 DM. And the context of that was Dan claiming that everybody in
20 this sphere was nonconsensually distributing materials of other
21 people. So that was the context where I was thinking, like,
22 no, the guy I had, my former boyfriend's consent, the only one
23 person I was with before.

24 MR. BRETTLER: Move to strike as nonresponsive.

1 BY MR. BRETTLER:

2 Q. My question, Ms. Doe, was, do you recall texting or posting
3 online on January 3rd, at 10:37 p.m.: I have never sent videos
4 of other people to Steven ever?

5 A. I remember messaging Dan privately. It's very different
6 than a social media post.

7 Q. Yes?

8 A. Yes.

9 Q. The answer is yes.

10 Move to strike everything after yes.

11 That wasn't a true statement, was it, Ms. Doe?

12 A. No, it wasn't. I --

13 THE COURT: And who is this character, Dan, what is
14 his name?

15 THE WITNESS: Dan Saltman is one of the best friends
16 of Destiny, who is also a business partner with Destiny.
17 They run a podcast together. He was going online claiming that
18 everybody had done what Steven had done, and that's when I
19 messaged him.

20 THE COURT: So you're responding to him?

21 THE WITNESS: Because I saw him on a podcast or on a
22 stream, and he was making those claims. And this was the 3rd,
23 right? January 3rd? Can you confirm that? No? Okay.

24 THE COURT: What was the date of the communication?

25 MR. BRETTLER: January, 3rd, 2025, Your Honor.

1 THE WITNESS: Yeah. So, this was still before I
2 was -- before I made my Substack, basically. I was still
3 trying to -- I was still in a state of denial between when I
4 first found out and between when I made my Substack. I was
5 trying to down-play what happened as much as possible, claimed
6 that, no, like, everyone's just confused, everyone's just
7 wrong.

8 THE COURT: Let me ask you this question: Prior to
9 this point, had you already been engaging online with others
10 about your problem?

11 THE WITNESS: Yes.

12 THE COURT: How often?

13 THE WITNESS: To the people who would randomly send me
14 DMs being like, this is you, this is you, I would try my best
15 to, like, deny it.

16 THE COURT: No, but on an online platform, in other
17 words, on a more public platform.

18 THE WITNESS: Oh, on a more public platform? No, I
19 did not -- I did not claim, like, make statements about it
20 being me or anything like that.

21 THE COURT: Okay.

22 BY MR. BRETTLER:

23 Q. Going back in time, do you remember when you messaged
24 Mr. Bonnell in March of 2020: Did you get the video? I'm also
25 open to any videos you want to send me, in general. LOL.

1 MR. LAGE: Objection, asked and answered, relevance.

2 THE COURT: Overruled.

3 A. As I said before, I assume it exists.

4 BY MR. BRETTLER:

5 Q. Okay. And do you recall telling Mr. Bonnell after he
6 expressed that he enjoyed watching your video: Ha, ha. Yeah,
7 it felt really good when he was being dominant and making sure
8 I was a good girl for him?

9 MR. LAGE: Objection, Your Honor, relevance. There's
10 no doubt that this took place.

11 THE COURT: Overruled, overruled.

12 A. Yeah.

13 BY MR. BRETTLER:

14 Q. Do you recall responding that way?

15 A. I assume it exists.

16 Q. Okay. And do you recall telling Mr. Bonnell also around
17 that time: Ha ha. That's the whole video, but I have another
18 video of me fucking in lingerie that won't send through here,
19 and, no worries, we can talk about it more tomorrow?

20 A. I assume it exists.

21 Q. Do you recall asking Mr. Bonnell also in March of 2019:
22 Do you have anywhere else you think the videos could send to?

23 A. I assume it exists.

24 Q. You -- you inquired whether or not he could send the videos
25 to you via Instagram. Do you recall that?

1 A. Yes.

2 Q. It was your idea, Ms. Doe, to make a sexually explicit
3 video with Mr. Bonnell, correct?

4 A. That I'm not completely sure of.

5 Q. On March 19th, 2020, at 5:12 in the morning --

6 THE COURT: I thought you said that he suggested it.
7 Did I misunderstand that?

8 THE WITNESS: No, I'm pretty -- well, again, like, I
9 don't have the messages, so it's hard for me to exactly recall.
10 I remember him sending me something of Melina's earlier on, and
11 me assuming, oh, like, do you want to make videos together? As
12 a response to that. But, again, I don't have the messages, I
13 can't recall perfectly, but that's --

14 THE COURT: It's possible that you brought up the
15 topic of recording with him?

16 THE WITNESS: It's possible.

17 THE COURT: Okay.

18 BY MR. BRETTLER:

19 Q. Not only is it possible, but on March 19th, 2020, at 5:12
20 in the morning, do you recall sending a message to Mr. Bonnell:
21 Mmm, it's going to be so nice when you do, question mark.
22 Would you want to make some videos together?

23 And Mr. Bonnell responded at 5:13, one minute later:
24 If you want to, yeah, for sure.

25 Do you remember that exchange?

1 A. Yeah, and I remember before that was when he sent the stuff
2 about Melina, but, yeah, continue.

3 Q. So, does that impact your testimony at all that it was
4 Mr. Bonnell's idea to make the video? Or do you now realize
5 that you were the one that first raised the idea about making
6 videos together?

7 A. What I claimed was that he sent me Melina's stuff, and as a
8 response to that, I was like: Oh, do you want to make stuff
9 together? Because I thought him sending Melina's stuff was
10 like, oh, yeah, like, you know, he's into recording stuff.

11 Q. My question was: Does it refresh your recollection that it
12 was your idea to actually suggest making a video with
13 Mr. Bonnell?

14 A. I'm trying to think how to phrase this in a way that makes
15 sense. If I'm like. All right, I'll use this analogy. If I
16 have like a cup of water, and I drink it, and I'm like, oh, my
17 God, you know, water is really cool, I love water. You know,
18 water's awesome.

19 And you go, oh, hey, do you want some water? Because
20 you keep, you know, you sat here talking about water.

21 Is it -- okay -- I'm not sure how to phrase this. The
22 way that --

23 THE COURT: Well, is it safe to say you're not sure
24 whether it was your idea or his idea initially?

25 THE WITNESS: Yeah, because --

1 THE COURT: That's fine.

2 The next question.

3 BY MR. BRETTLER:

4 Q. The next question is: Do you recall sending Mr. Bonnell a
5 subsequent message saying: Do you want to take videos when we
6 do stuff together? I think I'd really like one of you coming
7 in me.

8 A. I assume it's true.

9 THE COURT: So this is in March 2020 or 2019?

10 MR. BRETTLER: 2020, Your Honor.

11 THE COURT: Okay. So then the first video that you
12 had with him is sometime thereafter, I'd take it?

13 THE WITNESS: Yes.

14 THE COURT: Okay.

15 BY MR. BRETTLER:

16 Q. Do you recall after the video was published on Kiwi Farms,
17 you told Mr. Bonnell that it's not clear that it's your face or
18 anything like that, and that you are 100 percent denying it's
19 you in the video?

20 A. Oh, yeah, I was in complete denial. I was, like, oh, well,
21 maybe people can't see -- my face is clear as day in that
22 video.

23 Q. Do you recall telling Mr. --

24 THE COURT: When did you tell him this, I'm sorry,
25 when was this exchange?

1 THE WITNESS: I believe immediately after I was
2 getting messages from everybody telling me I was in the video.

3 THE COURT: So sometime in November, early December?

4 THE WITNESS: Yeah.

5 MR. BRETTLER: November 29th, Your Honor, the day
6 after she claims to have identified the video.

7 BY MR. BRETTLER:

8 Q. Do you recall, Ms. Doe, that following the publication of
9 the video on Kiwi Farms that you created what's called a
10 Substack page where you talked about this matter?

11 A. Yes.

12 THE COURT: What is a Substack page?

13 THE WITNESS: Substack is basically like a platform.
14 It's kind of a social media platform where people post more
15 like longer articles or statements or things of -- I would even
16 argue more of an academic nature than other platforms.

17 THE COURT: So it's not, like, for videos. It's for
18 more articles or writings?

19 THE WITNESS: Yes, yes.

20 THE COURT: Okay.

21 And is this public?

22 THE WITNESS: Yes.

23 THE COURT: And do you create a profile just like you
24 would for Instagram or something?

25 THE WITNESS: Yes.

1 BY MR. BRETTLER:

2 Q. And on your Substack page, you notified the world or all of
3 your followers, at least, that have access to your Substack
4 page, about the existence of this video, correct?

5 A. I think "notified" kind of implies that they realized for
6 the first time, and I don't think that's true at all.

7 THE COURT: Let me back up: When did you first create
8 this Substack profile?

9 THE WITNESS: Honestly, I can't remember, because I
10 remember I created one a long time ago because I was like, oh,
11 maybe I want to start writing articles, I'll have it. But I'm
12 not sure if that's the same account I created for this posting,
13 so I can't really remember when.

14 THE COURT: Okay.

15 And can one make it public, or is it private, or is it
16 automatically public?

17 THE WITNESS: You can actually do both. You can
18 create private articles, save them in drafts, or you can
19 publicize them.

20 THE COURT: And the one that relates to this -- after
21 November 28th, did you make it public or private?

22 THE WITNESS: I made it public.

23 THE COURT: Okay.

24 BY MR. BRETTLER:

25 Q. It was before you filed your lawsuit that you made it

1 public, correct?

2 A. Yes, but I do want to point out, I feel like the claim,
3 like, made it public. It was already public information.
4 Like, what happened that day was two people -- I'll start here.
5 I found out my best friend --

6 MR. BRETTLER: Your Honor, there's no question
7 pending.

8 THE COURT: I'll let her answer. Go ahead.

9 MR. BRETTLER: Okay.

10 A. I found out that my best friend had betrayed me and was
11 sending my private messages with her regarding the situation to
12 random other people online. And then those people, who I did
13 not know, decided to make YouTube videos with those messages.
14 And those YouTube videos were of defamatory nature. They claim
15 that I took hush money, that I was extorting Steven, and that I
16 do not care about other victims. They were gaining tens of
17 thousands of views.

18 At this point, on top of the YouTube videos, previous
19 to me publishing the Substack, accounts with tens of thousands,
20 if not hundreds of thousands of followers were publicly making
21 fun of me on Twitter. They were, you know: Pxie, ew, your sex
22 tape got leaked, that's quite the L. A whole bunch of stuff.

23 So, it was -- after the combination of having these
24 accounts, making fun of me over the tape, and then having the
25 YouTube videos that were gaining thens of thousands of views

1 with my private messages lying about me that I felt compelled
2 to publish my Substack and clarify that, no, I didn't take hush
3 money, I was not extorting Steven, and I do care about other
4 victims. So, that's why I take issue with the whole idea of,
5 oh, you publicized it, because it was already public. People
6 were already talking about it. I just said the truth and
7 defended myself.

8 THE COURT: Were you concerned, though, that by doing
9 that you were only making the story even bigger? Because then
10 more people would then try to find your video.

11 THE WITNESS: I thought about that, and that's why I
12 specifically put two things. I put "nudes" because I thought
13 people were less likely to search up the video, but then on top
14 of that, it was already in motion.

15 THE COURT: What do you mean you put nudes?

16 THE WITNESS: Instead of saying my video, the video, a
17 video, I said, oh, he disseminated nudes. And then --

18 THE COURT: I see. In other words, you didn't put
19 images yourself. You referred to them as that, okay.

20 THE WITNESS: Yes, I said the nudes.

21 THE COURT: Okay.

22 THE WITNESS: And then, also, I never mentioned what
23 websites they were hosted on, specifically, so I just said,
24 like, you know, he sent it online. And, also, at this point in
25 time, it was -- the machine was already running, I guess is the

1 best way I can say it. The videos were gaining so much
2 traction and people were just repeating what was on those
3 videos that I felt like, okay, either I can make a statement
4 now and defend myself before everybody believes these lies, or
5 I can stay quiet and do nothing and hope it will go away, but
6 it's not going away. It's been two months. It's been
7 two months since original leaks. People are still talking
8 about it, people are still harassing me, and now I have these
9 videos gaining, like, thousands of views and, you know, either
10 I can do my best to protect what little I have left, or I can
11 stay quiet, and --

12 THE COURT: And you -- did you make an effort to --
13 after November -- before you did your own Substack, did you
14 make an effort to take down the video off the -- off the Kiwi
15 thing? Is there a process where you communicate with Kiwi to
16 take down things that are improper?

17 THE WITNESS: So I was in communication with Steven
18 beforehand, and he told me that he had hired a legal firm who
19 was dealing with that stuff. So in my head, I was, like,
20 okay --

21 THE COURT: He was doing it.

22 THE WITNESS: Yes, Steven was dealing with the
23 Kiwi Farm legal team. When it came to other websites -- and I
24 had a conversation with Steven about this, I was submitting,
25 basically, Google request forms and, like, forms to those

1 websites as well, personally, just trying to be, like, oh, no,
2 this nonconsensual, revenge porn, please take it down. So I
3 was making those efforts beforehand as well.

4 THE COURT: Thank you.

5 MR. BRETTLER: Thank you, Your Honor.

6 BY MR. BRETTLER:

7 Q. And since you brought it up, Ms. Doe, about the idea of
8 extortion, do you recall messaging Mr. Bonnell: I feel that
9 whatever I ask you to cover will be too high a price, and then
10 I'm even going to feel worse over it?

11 A. Yeah --

12 MR. LAGE: Objection, Your Honor. There's no
13 extortion reference in the record, so I object to the form.

14 MR. BRETTLER: She opened the door, Your Honor.

15 THE COURT: I didn't understand your question anyways,
16 so I'll sustain. Ask another one.

17 MR. BRETTLER: I'll withdraw it for now. I'll come
18 back.

19 BY MR. BRETTLER:

20 Q. In addition to your Substack --

21 THE COURT: It's got to follow all the particulars, in
22 fairness.

23 MR. BRETTLER: I understand, Your Honor, and I will be
24 more clear.

25 THE COURT: Okay.

1 BY MR. BRETTLER:

2 Q. In addition to your Substack, did you create a -- what's
3 called Go Send Go account to promote your lawsuit against
4 Mr. Bonnell?

5 A. A Go Send Go?

6 Q. Correct.

7 A. I made a GiveSendGo.

8 Q. GiveSendGo.

9 A. Yeah.

10 Q. Okay. And --

11 THE COURT: How do you spell that?

12 MR. BRETTLER: Give, G-I-V-E. Send, S-E-N-D. Go,
13 G-O.

14 BY MR. BRETTLER:

15 Q. And GiveSendGo is similar to a GoFundMe page, correct?

16 A. Yes.

17 Q. And the purpose of you creating this GiveSendGo page was to
18 raise money to pursue a legal claim against Mr. Bonnell,
19 correct?

20 A. Yes.

21 Q. And on your GiveSendGo page you linked to your Substack
22 post in which you described your version of this situation,
23 correct?

24 A. Yes.

25 Q. And to date, how much money have you raised from your

1 GiveSendGo page?

2 MR. LAGE: Objection, Your Honor. It's outside the
3 scope of the direct, and it's completely irrelevant to what
4 we're talking about here today.

5 THE COURT: How is it relevant?

6 MR. BRETTLER: How is it relevant, Your Honor? She
7 has been promoting this lawsuit and claiming that this has cost
8 her so much money, that other people are learning of the
9 lawsuit from Mr. Bonnell when really she's hosting a
10 fundraising page trying to raise money and continues to raise
11 money. And I think it's important to see how much money has
12 come in and when that money has come in.

13 THE COURT: It's relevant to ultimately damages, but
14 for the purposes of an injunction hearing, which prong is it
15 relevant to?

16 MR. BRETTLER: I think it goes to irreparable harm,
17 Your Honor. She's continuing to publicize the fact that the
18 video exists, that she has a lawsuit that's pending against
19 Mr. Bonnell in federal court, and she's publicizing that fact
20 and trying to raise money for it. I'll move on if the Court
21 you know --

22 THE COURT: I'll sustain the objection as to the
23 relevance of the amount, but not as to the --

24 MR. BRETTLER: The existence of the site.

25 THE COURT: Exactly.

1 BY MR. BRETTLER:

2 Q. And when you created that GiveSendGo page, Ms. Doe, you
3 created it using your legal name, didn't you?

4 A. No. I originally created it using my friend's name, she
5 allowed me to use it, to be able to retrieve -- yeah.

6 Originally, it was created in my friend's name.

7 Q. And it stated on the page that all proceeds would go to
8 your legal name, which I'll leave off of the record here; is
9 that correct?

10 A. So what happened --

11 Q. Yes or no?

12 A. It's more complicated than just yes or no.

13 Q. But it is a yes-or-no question.

14 A. No, it's not a yes or no -- okay.

15 What happened, I created the name under Laur- -- my
16 friend's name, and then the website didn't tell me that it
17 would do this, but they said, okay, put your name, like, your
18 bank account information, your name, to receive the funds. But
19 when I did that, it published it temporarily for a short time
20 onto the page. And when I realized that, I contacted
21 GiveSendGo, and I was like: Hey, I don't want my name on
22 there. Like, you know, can you change it? And then they
23 adhered and changed it.

24 So it wasn't that I created this knowing my legal name
25 was going to be attached to that. I was under the impression

1 that it would just be my friend's name.

2 THE COURT: Because you weren't allowed to use a fake
3 name, like your online name?

4 THE WITNESS: No, because it was for the bank account
5 information, and that's when they put my legal name. And when
6 I contacted them, and I was, like, hey, like, it's really
7 important for me to not have my name on there, that's when they
8 publicly changed the name back to my pseudonym.

9 THE COURT: Okay.

10 BY MR. BRETTLER:

11 Q. So you were allowed to use your pseudonym, correct?

12 A. Not initially, no. It was only after I contacted the
13 website and told them, like, hey, like, I didn't know that when
14 I put my bank account information, that means that you would
15 have, like, put my name there, too. Like, please, can you
16 change it to something else?

17 And they were, like, oh, okay, we'll change it. So it
18 wasn't originally an option for me.

19 Q. You had a Bluesky Social account too, correct?

20 A. Yes.

21 Q. And that's similar to an X or a Twitter account?

22 A. Yes.

23 Q. And on Bluesky Social, you publicized the fact that you
24 would be suing Destiny in federal court and linked to your
25 Substack and your GiveSendGo page, correct?

1 A. Yes, yeah.

2 Q. And you did that before filing this lawsuit, correct?

3 A. Yes.

4 Q. You have submitted hundreds of pages of evidence in this
5 case. Do you have any evidence that Mr. Bonnell transmitted
6 your video, the video of the two of you engaging in consensual
7 sex, after October of 2022?

8 A. Abbymc's affidavit.

9 Q. Where is Abbymc?

10 A. She lives outside of Florida.

11 Q. Has she produced a single document to demonstrate that the
12 video was transmitted to her after the effective date of the
13 federal statute under which you are suing Mr. Bonnell?

14 A. Yeah, when she originally received the videos, she had
15 messaged her friend shortly thereafter in 2023. You know,
16 Destiny sends me these videos thinking I don't know who these
17 girls are, but I do, it's Chaeiry and Pxie, he should really be
18 more careful.

19 THE COURT: And how do you know this?

20 THE WITNESS: I know this because Abby submitted the
21 messages to us in evidence.

22 BY MR. BRETTLER:

23 Q. And there's not a single message attached to Abbymc's
24 declaration that reflects that the transmission of the video
25 was made after the effective date of the statute, correct?

1 THE COURT: Do you know what the effective date of the
2 statute is?

3 MR. BRETTLER: Let's say October of 2022.

4 A. I believe that just timeline-wise Abby didn't meet him
5 until 2023, so it would have not been possible for her to send
6 those messages before 2023.

7 BY MR. BRETTLER:

8 Q. My question to you is: Did you submit any evidence
9 reflecting the transmission of a video after October of '22
10 from any witness, Abbymc or anyone else? Do you have any
11 evidence at all other than what you are speculating, that
12 Mr. Bonnell transmitted your video after October of 2022?

13 MR. LAGE: Objection, calls for a legal conclusion.

14 MR. BRETTLER: I'm asking if you have any evidence,
15 that's all?

16 THE COURT: Overruled.

17 THE WITNESS: Does the affidavit not count as
18 evidence?

19 THE COURT: It counts.

20 A. So yes.

21 BY MR. BRETTLER:

22 Q. You have a statement. Do you have any documentation?

23 A. That's documentation.

24 Q. Do you have any evidence demonstrating a transmission of a
25 video from Mr. Bonnell to any third party in the world after

1 October of '22?

2 MR. LAGE: Objection, Your Honor, asked and answered.

3 She already said there's evidence and there are statements, and
4 they're part of the record.

5 THE COURT: Sustained.

6 A. So --

7 MR. BRETTLER: You don't have to answer.

8 The next question.

9 BY MR. BRETTLER:

10 Q. Do you recall publishing on social media in April of this
11 year that your goal here is to bankrupt Mr. Bonnell?

12 A. I don't think I said bankrupt.

13 Q. Okay. What word do you think you used?

14 A. Can you just read me the -- I can't remember what word I
15 exact- -- just read me what I wrote supposedly or . . .

16 Q. Has there been any instance since this lawsuit has been
17 filed where Mr. Bonnell -- where you have any proof whatsoever
18 that Mr. Bonnell has transmitted the video to any third person?

19 MR. LAGE: Judge, asked and answered, Your Honor.

20 MR. BRETTLER: No, it's a different question.

21 BY MR. BRETTLER:

22 Q. Since the lawsuit was filed, do you have any evidence that
23 Mr. Bonnell has transmitted the video to any third person?

24 MR. LAGE: Objection, Your Honor, asked and answered.

25 It's the same question.

1 MR. BRETTLER: It's not the same question.

2 THE COURT: Sustained on a different basis.

3 MR. BRETTLER: Can I get some guidance? What's the
4 basis for the objection?

5 THE COURT: I think she's already talked about that,
6 so if you want to ask about a more specific thing, that's fine
7 with me. For example, have you seen any transmission yourself
8 or record of a transmission as opposed to what somebody's told
9 you that evidenced Mr. Bonnell sending a video after October of
10 2022? Have you seen anything?

11 THE WITNESS: I'm sorry. I wasn't sure if he was
12 going to ask that again, okay.

13 I have not seen the video -- him sending the video.

14 MR. BRETTLER: No further questions, Your Honor.

15 THE COURT: Redirect?

16 MR. LAGE: Yes, sir.

17 REDIRECT EXAMINATION

18 BY MR. LAGE:

19 Q. Mr. Brettler asked you about the goals of your lawsuit. He
20 asked you about whether the stated goal of your lawsuit is to
21 bankrupt Mr. Bonnell. Why did you bring this lawsuit?

22 A. I brought this lawsuit because I am under the impression
23 that Destiny is going to continue sending people's intimate
24 images and pornographic content without consent. I think I
25 have good reason to believe this. I think he -- unless he

1 faces some level of consequences, I think that's what he's
2 going to keep doing. I think he thinks that he's invincible
3 legally and socially. He's talked multiple times about how he
4 gets a competitive high from people trying to ruin his career
5 and trying to ruin his life and how he continues to seek that.
6 And I honestly think that if nobody tries to bring him to
7 justice or if nobody tries to do something about his current
8 actions, he's just going to do it for perpetuity. It's not
9 going to end. It's never going to stop. And I just -- like, I
10 can't. Like, the reason why I was originally suicidal was the
11 idea that he would just continue to keep doing this. And I
12 honestly -- like, even if -- even if I lose, like, I don't
13 think I could live with myself, like, thinking, like, oh, I had
14 a chance to stop him, I had a chance to do something to make
15 sure this didn't happen again, to stop other women from being
16 hurt, and I just -- I did nothing.

17 Q. You were asked about your GiveSendGo account. Are you
18 personally wealthy?

19 A. No.

20 Q. Can you afford to pay lawyers hundreds of dollars per hour
21 to prosecute your case for you?

22 A. No.

23 MR. BRETTLER: Your Honor, I object. If they wouldn't
24 let me get into how much money she's raised, her financial
25 situation is completely irrelevant.

1 THE COURT: Overruled.

2 MR. LAGE: She did.

3 THE COURT: She can answer. She said no.

4 BY MR. LAGE:

5 Q. As far as dissemination of the video after October of 2022,
6 there is a dispute as to whether or not the actual initial
7 sharing of the video occurred on October 4th, 2022, or
8 April 10th, 2022.

9 Are you aware of that?

10 A. Yeah.

11 Q. Okay. And could you explain that a little bit for
12 the Court's edification of what the dispute is about?

13 MR. BRETTLER: Objection, vague and ambiguous, and
14 calls for a narrative.

15 THE COURT: How is she going to know this, sir? Lay a
16 foundation for that.

17 BY MR. LAGE:

18 Q. Okay. Do you know when purportedly this video was shared
19 with Rose?

20 A. I don't know the exact date. I saw the leaked messages,
21 and it seems like the messages were -- the way I read them was
22 October 4th, 2022, but their side is saying, oh, no, it was --
23 the dates were reversed, it's actually -- it's European time
24 or something. It was actually April 4, 2022, so . . .

25 THE COURT: April 10th.

1 THE WITNESS: April 10, I'm sorry. April 10.

2 So I don't really know, like, we would have to verify
3 that information.

4 BY MR. LAGE:

5 Q. Okay. But that information is information that you had
6 gleaned from the actual posts themselves, correct?

7 A. Yes.

8 Q. And you reviewed those posts, correct?

9 A. Yes.

10 Q. And the timeline of October 4, 2022, is temporally close to
11 the time that the videos were ultimately posted?

12 A. Yes.

13 Sorry, can you repeat? I said yes. You said
14 temporally close to the times the videos were posted?

15 Q. Correct.

16 A. So you mean they were -- they were just close, right?

17 Q. Yes. We'll move on.

18 As far as your Substack, why did you post the
19 Substack?

20 A. There's a variety of reasons why I decided to post to
21 Substack. I posted the Substack because people were -- and the
22 videos were gaining traction, ones that contained blatant lies
23 about me and were defamatory in nature. So, one, I felt like I
24 had to defend myself and tell people the truth.

25 Two, I did have to find a way to gain some level of

1 legal funds if I wanted to pursue this legally because I was
2 told that cases like these can get really expensive.

3 And, three, I wanted people to know the truth. I
4 wanted people to know that what Steven did to me and to other
5 women was unacceptable, and I wanted to be the last person that
6 he ever decided to do this to.

7 THE COURT: And remind me, when was the Substack
8 created?

9 THE WITNESS: The Substack was created in
10 January 20th. Like, that's when the post was, when I posted.
11 The account --

12 THE COURT: And when did you file the lawsuit?

13 THE WITNESS: February 20th, I believe.

14 THE COURT: About a month before the lawsuit?

15 THE WITNESS: Yes.

16 BY MR. LAGE:

17 Q. Since the lawsuit, have you posted on Substack?

18 A. No.

19 Q. Have you made any commentary on social media about this
20 case since the inception of the lawsuit?

21 A. Yes.

22 Q. And when was that, and what was it in reference to?

23 A. I don't remember all the exact dates of the social media
24 posts, but I remember when we were able to get the seals, I
25 posted that online telling people, like, hey, like, we're able

1 to, like, seal some of these things. Like, you know, this is
2 something that's possible for us to do. The reason why I did
3 that was because there's a lot of women who are really scared
4 of coming forward or to speak anything about relating to this.
5 They're afraid of getting harassed, they're afraid of getting
6 doxed. So I thought that was very important information to
7 post.

8 Q. When you posted on Substack, did you use your real name, or
9 did you use your handle?

10 A. Handle.

11 Q. Mr. Brettler went through some intimate texts that you had
12 with Mr. Bonnell leading up to your sexual encounter. At any
13 time in any of your interactions with Mr. Bonnell, did you ever
14 indicate in any way that it would be okay for him to share the
15 video of you with anyone?

16 A. No.

17 MR. LAGE: I don't have any further questions at this
18 time.

19 THE COURT: All right. Thank you, ma'am. You may
20 step down.

21 THE WITNESS: Thank you.

22 Do you want to call the Defendant?

23 MR. LAGE: I do.

24 THE COURT: What I would rather do is have the
25 defendant do the direct on the defendant, so we can do it the

1 streamlined way.

2 MR. BRETTLER: We'll call Defendant Steven Bonnell,
3 please.

4 THE CLERK DEPUTY: Please state full name for the
5 record and spell your last name for the record, please.

6 THE WITNESS: My name is Steven Bonnell II. My last
7 name is B-O-N-N-E-L-L.

8 Thereupon:

9 STEVEN K. BONNELL II,
10 having been first duly sworn, was examined and testified as
11 follows:

12 DIRECT EXAMINATION

13 BY MR. BRETTLER:

14 Q. Thank you, Mr. Bonnell. Do you go by any other names?

15 A. No. My online handle is Destiny.

16 Q. Okay. And your online handle is Destiny. What -- who is
17 Destiny?

18 A. It's basically just me doing politics, philosophy, and
19 video games.

20 Q. Okay. And could you explain to the Court what you mean by
21 doing politics, philosophy, and video games. Are you on an
22 online streamer?

23 A. Correct. It's like YouTube videos, but you're posting them
24 live, basically.

25 Q. And do you know the Plaintiff in this case?

1 A. Yes.

2 Q. How do you know the Plaintiff?

3 A. She reached out to me after we did a Twitch debate panel
4 maybe five years ago I think in 2020, and we began chatting
5 from there.

6 Q. And did you and the Plaintiff develop an online friendship?

7 A. Yes.

8 Q. At any point during your online friendship with Plaintiff,
9 did your conversations turn to a sexual nature?

10 A. Yes.

11 Q. And what -- at what point did they turn to a sexual nature?

12 A. I don't recall exactly. Pretty soon, maybe a few months
13 after talking.

14 Q. And when you agreed that they turned into a sexual nature,
15 how would you characterize that? What do you mean by the
16 conversation turned sexual in nature?

17 A. I think it began chatting, topics get a bit racier, maybe
18 conversations about current partners and then sexual activity,
19 and then it kind of tends in that direction.

20 Q. Was there a time when you had asked the Plaintiff if -- if
21 she was interested in watching sexually explicit videos of you?

22 A. Yes, I believe so.

23 Q. And was there a time when Plaintiff asked you if you were
24 interested in watching sexually explicit videos of her?

25 A. Yes.

1 Q. And did you, in fact, exchange sexually explicit videos of
2 each other with the Plaintiff?

3 Did you --

4 A. Of each other? As in me and her or?

5 Q. I asked a bad question.

6 Did you exchange videos of yourself with Plaintiff of
7 a sexual nature?

8 A. Yes.

9 Q. And did she exchange videos of herself of a sexual nature
10 with you?

11 A. Yes.

12 Q. And was there ever any discussion prior to exchanging those
13 videos on who you were allowed to send the videos to or who she
14 was allowed to send the videos to?

15 MR. LAGE: Your Honor, objection. Understanding that
16 this is an injunction hearing, and this is his witness. He's
17 leading the -- he's asking leading questions throughout the
18 testimony, understanding the nature of the hearing.

19 THE COURT: I don't think they're leading. Overruled.

20 BY MR. BRETTLER:

21 Q. You can answer, Steven.

22 A. I'm sorry, can you restate the question?

23 Q. Yes. Was there a time when -- I'm sorry. The question
24 was: Was there ever any -- any rules on who these videos could
25 be shared with?

1 A. If those conversations occurred, it would have been in
2 person, it would have been five years ago. I can't recall the
3 specifics of those conversations.

4 Q. Do you recall telling the Plaintiff that you intended to
5 share the videos with your then fiancee?

6 A. Well, I can't recall that explicitly. It certainly would
7 have come up. There's no world where my fiancee would allow me
8 to send videos of me and her to another person, and if I
9 recorded something with the other person to not share those
10 videos with her, of course.

11 Q. And do you recall the Plaintiff telling you that her sexual
12 partners would be seeing videos that you sent her?

13 A. Again, I don't believe that they ever explicitly mentioned
14 that. It probably would have been assumed based on our
15 conversations.

16 Q. In 2022, did you come to meet someone online named Rose?

17 A. If by meet online you mean digitally talk to each other,
18 yes, yeah.

19 THE COURT: Before you get there, how long did you
20 have any sexual relations with the Plaintiff?

21 THE WITNESS: Before I communicated with the party in
22 2022, I believe me and Plaintiff I believe recorded in -- wait,
23 I'm sorry. Let me understand, when you say any sexual
24 relations, do you mean conversations or in real life?

25 THE COURT: In real life.

1 THE WITNESS: I believe it's in the record, but I
2 think the Plaintiff I want to say was maybe -- had just turned
3 21 when we did, so whatever math is, maybe 2021, I think, was
4 the date on that.

5 THE COURT: And how long did you have a sexual
6 relationship in real life with her?

7 THE WITNESS: In real life, we only met sexually one
8 time.

9 THE COURT: Okay.

10 THE WITNESS: We continued sexual conversations after,
11 but we only had one sexual encounter .

12 THE COURT: You only had one encounter.

13 THE WITNESS: Correct.

14 THE COURT: Okay.

15 BY MR. BRETTLER:

16 Q. Yeah, let me back up. I did jump ahead a bit. Did you at
17 some point decide to make videos, sexually explicit videos,
18 with Plaintiff?

19 A. With her, yes, yeah.

20 Q. Okay. And was that in, you know, approximately March of
21 2020?

22 A. That sounds right.

23 Q. Do you recall whose idea it was to make sexually explicit
24 videos together?

25 A. I believe it was her suggestion.

1 Q. And did you arrange to meet with Plaintiff in person to
2 actually record a video together?

3 A. Among other things, yes.

4 Q. And do you recall approximately when you met Plaintiff to
5 record the explicit video?

6 A. Probably sometime after July of 2020. I don't recall the
7 exact date.

8 Q. Would September 6th, 2020, sound about right?

9 A. That would, yeah.

10 Q. And during that meeting -- firstly, where did you meet to
11 record this video?

12 A. I can't recall exactly where it was, but the place that we
13 met, initially we met for dinner with two friends of mine, so
14 it must have been in Florida, maybe Miami, I guess.

15 Q. Okay. And at the time, were you married?

16 A. I don't believe I was married. I think we were engaged to
17 be married, though. My wife was from Europe, so . . .

18 THE COURT: Your wife was a what?

19 THE WITNESS: She was from Europe, Swedish.

20 THE COURT: Oh, from Europe.

21 THE WITNESS: Yep.

22 THE COURT: Got it.

23 THE WITNESS: So the marriage process was a -- kind of
24 convoluted for a bit, yeah.

1 BY MR. BRETTLER:

2 Q. And did you, in fact, record a sexually explicit video with
3 the Plaintiff in September of 2020?

4 A. Multiple, yes.

5 Q. And when you say "multiple," what did these videos depict?
6 Generally, we're not asking for details.

7 A. Two of us engaged in one-on-one sexual encounter.

8 Q. And the encounter was entirely consensual?

9 A. Yes.

10 Q. In early 2022, do you recall receiving a online message
11 from a woman named Rose on Discord?

12 A. Yes. When you say a woman name, that was her screen name,
13 yes.

14 Q. Screen name, Rose. And, as best you can describe, who is
15 Rose?

16 A. As an online content creator, a lot of people reach out to
17 me, kind of like Plaintiff through different platforms. This
18 is a person who initially sent messages to me on Twitter, at
19 the time it was called, now X. It was just a person who
20 reached out, who seemed to engage in some kind of sex work on
21 X. And then she reached out to me and personally messaged me
22 on that platform, and then we switched to Discord.

23 Q. And did Rose send you sexually explicit videos over Discord
24 or any other online means?

25 A. Yes.

1 Q. And did you send Rose explicit -- sexually explicit videos
2 of yourself?

3 A. Yes.

4 Q. And was one of the videos that you shared with Rose a copy
5 of the video that you made with Plaintiff?

6 A. Yes, although Rose didn't know who Plaintiff was at that
7 time.

8 Q. And you did not identify Plaintiff in that video by her
9 screen name, correct?

10 A. By any name, no.

11 Q. And do you recall approximately the date that you
12 transmitted that message to Rose containing the sexually
13 explicit video?

14 A. I believe it would have been April 9th or April 10th on
15 2022.

16 Q. Okay.

17 And do you understand that there has been some
18 testimony today about whether or not the date format that's
19 reflected in the transmission documents was in the European
20 format or United States format?

21 A. I'm aware there's testimony concerning that, yes.

22 Q. And how are you certain that the transmission of the video
23 took place in April -- on April 9th or 10th and not October 4th
24 or -- or so?

25 A. There are multiple ways. One is I have a backup of all of

1 my messages with this person. A second way is that those
2 messages still exist on Discord from that person in the date of
3 April. The third way would be that when those logs are posted
4 that are supposedly in contention, the timestamp at the bottom
5 is written in a time zone that is European. And the fourth way
6 would be that that same European Time Zone is referenced by I
7 believe the person who posted those on the aforementioned
8 website, Kiwi Farms.

9 Q. And since April 9th, 2022, or let's say, April 10th in
10 2022, in Europe, at one o'clock in the morning, had you
11 transmitted the video to Rose or to anyone else, to the best of
12 your knowledge?

13 A. No, no.

14 Q. You're aware that Plaintiff claims that approximately 15
15 witnesses contacted her claiming to have evidence that you
16 shared the video with them? Are you aware of this?

17 A. I feel like I've seen conflicting statements about whether
18 it's the video in the complaint or just other videos that
19 aren't the subject of this complaint, but I've seen this, yeah.

20 Q. And have you sent the video of yourself and the Plaintiff
21 to anyone apart from Rose -- let me stop there. To anyone
22 apart from Rose?

23 A. Maybe my ex-wife, we might have watched it in person, but
24 it would have been after the videos were recorded, so . . .

25 Q. So none of these 15 potential witnesses that Plaintiff has

1 identified, however they've identified them, certainly not by
2 name, you have never sent a video to any of those 15 people?

3 A. I don't -- no, I don't think so. I'm only uncomfortable
4 because the 15 names haven't been made available to me, so say,
5 for instance, my ex-wife was one of those 15, then in 2020
6 after we recorded maybe, but to my knowledge, no. To the best
7 of my knowledge.

8 Q. Apart from your ex-wife --

9 THE COURT: How do you know, though?

10 THE WITNESS: How I do know what?

11 THE COURT: That you didn't send the video to others.

12 THE WITNESS: Yeah, you want me to explain that?

13 THE COURT: Yes.

14 THE WITNESS: So, after Plaintiff made her public
15 acknowledgment that she was going to file the lawsuit against
16 me, I became aware that I had an obligation to preserve
17 evidence for this case. So, the first thing I did was online
18 platforms allow you to request a copy of all of the messages
19 that you've sent I think as a result of the GDPR in Europe.
20 And once I made that request from all the online platforms that
21 I chatted on, I did a search through all of my messages to see
22 if I had sent either the Google Drive link or that video, or if
23 there were references to that video from anybody else that I
24 messaged, and I couldn't find any references to it at all.

25 THE COURT: At the time that you made the -- at the

1 time that you sent the video, had you met this person, Rose?

2 THE WITNESS: No, I had not.

3 THE COURT: Okay. So, had you -- prior to that, had
4 you sent sexual-related videos of others to other people?

5 THE WITNESS: Yeah, Plaintiff would be one of them,
6 yeah.

7 THE COURT: All right. So this wasn't the --

8 THE WITNESS: Well, let me very clear, I'm so
9 sorry. For sexual videos of other people, every sexual video
10 that I send is involving me. So there might be another person
11 in the video, but it's not just videos of others.

12 THE COURT: Right. In other words, of -- yes, sexual
13 videos that you created --

14 THE WITNESS: Yeah.

15 THE COURT: -- you sent them to other people before?

16 THE WITNESS: Yes.

17 THE COURT: And when you do that, do you normally get
18 consent from somebody or not get consent?

19 THE WITNESS: So, I would say that we generally have
20 conversation at the time of recording. People will express
21 varying levels of comfort about material existing. If
22 somebody's very uncomfortable, then we typically just won't
23 record anything. Other people have experience recording stuff.
24 I would say generally -- I mean, if asked, maybe I could
25 reproduce some of these conversations. I could go back and

1 check. But usually the conversation would be like, hey, well,
2 if you send it to anybody, just make sure it doesn't leak.
3 Haha. It's usually that kind of conversation.

4 THE COURT: At the time you sent the April 9th
5 video -- that you're saying is April 9th -- you knew it was a
6 video of you and the Plaintiff?

7 THE WITNESS: Yes.

8 THE COURT: And why didn't you -- why didn't you
9 communicate with the Plaintiff that you were intending to do
10 that?

11 THE WITNESS: I mean, we both -- or I won't speak for
12 the Plaintiff. I just have a lot of videos that I've recorded
13 with people in the past who've -- you know, who've also
14 recorded videos of me, and I would argue it's kind of norm that
15 we just kind of trade stuff around, basically.

16 THE COURT: So you thought you had some kind of
17 implied consent; is that what you're saying?

18 THE WITNESS: Yeah, basically. I mean, if they sent
19 me videos of them and other people, I've sent, myself, videos
20 with other people. I don't believe in any of the conversations
21 I've had, for instance, with Plaintiff, I don't think there was
22 ever an explicit ask. I don't believe she ever asked me -- I
23 don't believe she asked me if she could send it to her
24 boyfriend at the time, but I wouldn't have objected because my
25 understanding was basically that what we're doing this for,

1 yeah.

2 THE COURT: I see. And then did you consider
3 redacting the image of -- of her face? Did that come up in
4 your mind?

5 THE WITNESS: It didn't at the time. I'm not the best
6 at, like, video editing, per se. Like, I just -- I'm, like, a
7 presenter, so that would have been beyond my technical hurdle,
8 I guess.

9 THE COURT: But you're aware that you can do that.

10 THE WITNESS: Yeah, yeah. I would say, just on my
11 personal level, if I was at the point where I was trying to
12 redact parts of a video, I would be uncomfortable sending the
13 video at all because there are always other ways to identify
14 people, whether through an identifying mark or something.

15 THE COURT: So in this case, when you sent the
16 April 9th video, you weren't concerned about that?

17 THE WITNESS: No, the person at the time had already
18 shared explicit material with me. I had never had anybody leak
19 a bunch of my private, explicit material before. This other
20 person was also kind of like a sex worker person. Usually
21 they're pretty clear about that stuff. Like, it just doesn't
22 happen. It would ruin their business, so . . .

23 THE COURT: Okay.

24 BY MR. BRETTLER:

25 Q. Would you say, Mr. Bonnell, that it's common among your

1 community or your fans to trade sexually explicit material with
2 each other?

3 A. I would say it's common in certain circles.

4 Q. In what circles?

5 A. I would say it's common in certain circles. My community
6 can be quite broad, so I wouldn't generalize everybody that
7 way, but there are groups of people who trade a lot. So,
8 everybody that I believe is referenced in this case traded
9 multiple explicit material back and forth.

10 Q. Would Plaintiff be in that circle?

11 A. I know for a fact that Plaintiff has sent me videos with at
12 least one person and offered with at least others, but I don't
13 know -- I don't have copies of those videos anymore, so I can't
14 go back and check if it was always the same person. I don't
15 recall that.

16 Q. And there was testimony about a woman receiving your video
17 named Abbymc. Do you recall that testimony?

18 A. I recall that declaration, yes.

19 Q. And the testimony today about the fact that Ms. Mac
20 testified in her declaration that she received your video after
21 October of '22. Do you have any response to that?

22 A. So, again, as I stated earlier, I made a copy of all my
23 online conversations. When that person initially referenced me
24 sending them explicit material, I went back and I checked my
25 archive of the conversation that we had with each other. And

1 when we had a back and forth, the conversation was pertaining
2 to a pair of videos that were never at all related to
3 Plaintiff. I know the date she's referencing. I have my
4 messages from that day. If Plaintiffs request the discovery, I
5 can provide those messages, but, yeah, it was not the video
6 involving Plaintiff.

7 Q. You have never sent the video involving Plaintiff to anyone
8 after October of 2022, correct?

9 A. No. Or, correct, yeah.

10 Q. One of the questions that I wanted to ask you today was:
11 What steps did you take after Plaintiff alerted you to the fact
12 that her video or your video had been published online? What
13 steps did you take to prevent the dissemination of that video?

14 A. So, unfortunately, being a public figure, once something is
15 out there, the way you deal with is you have to be very careful
16 because there's a thing called the Streisand effect whereby
17 aggressively going after material, you end up publicizing it
18 even more. So I was in collaboration with Plaintiff to figure
19 out, you know, like, how do you want me to report these? Do I
20 make any of this public?

21 The steps that I took were generally e-mailing
22 websites, using a combination of, you know, a DMCA request for
23 one, which is a digital rights act saying: I have the
24 copyright of this video, please take it down. And then I had
25 my -- an assistant working, sending an email to Kiwi Farms

1 letting them know that this was revenge porn posted without my
2 consent. I don't believe either of those two circumstances
3 were helpful, but this is why I was pursuing -- I had another
4 litigation firm in New York that I was hoping to get an
5 injunction or something that would allow me to come with a
6 stronger tool.

7 Q. And tell me about that. You hired a firm in New York to do
8 what?

9 A. Well, initially the goal was to unmask and uncover the
10 person who publicly published all the material and potentially
11 to explore going after Kiwi Farms because the owner of that
12 website was knowingly hosting material that he knew was revenge
13 porn of me, and then publicizing it, making it available to
14 everybody.

15 MR. BRETTLER: Give me one moment, Your Honor.

16 Your Honor, I will reserve the remainder of my time
17 for redirect.

18 THE COURT: Thank you. Cross-examination.

19 CROSS-EXAMINATION

20 BY MR. LAGE:

21 Q. You're aware that you're opposing the Court issuing the
22 order to Kiwi Farms to take down the video of you and Ms. Doe,
23 correct?

24 A. Yes.

25 Q. It seems to kind of fly in the face of your stated intent

1 to want that video off the Internet, correct, sir?

2 A. No.

3 Q. No? You think those positions are consistent with one
4 another, correct?

5 A. Absolutely.

6 Q. Okay. Why?

7 A. My understanding is that a court order would only remove
8 the videos temporarily. The videos could just be reposted. I
9 don't believe the court order could make any statements about
10 future behavior. I saw a ton of other explicit material that
11 was posted on that website and across the internet, and none of
12 that material was requested to be taken down at all. If
13 anything, I believe that just those videos being taken down
14 might even exacerbate public postings of Plaintiff's own video
15 because people would see that's the only one being removed.
16 And I don't even know if you're going to issue court orders to
17 non-parties to cases. Although, I really wish that some other
18 parties were involved in this case.

19 Q. That other party that you wish was involved in the case is
20 somebody that you had contacted, correct? Rose?

21 A. Potentially.

22 Q. Okay. Are you aware that the operator of Kiwi Farms is an
23 individual by the name of Null or goes by the handle of Null?

24 A. Is his online name, yes.

25 Q. Okay.

1 MR. LAGE: May I publish, Your Honor?

2 THE COURT: Sure.

3 BY MR. LAGE:

4 Q. Do you see that on your screen, sir?

5 A. It's kind of cut off.

6 THE COURT: The zoom is on the top button.

7 There you go.

8 BY MR. LAGE:

9 Q. Can you see it now, sir?

10 A. Correct.

11 Q. Okay. So, you disagree with the statement from the
12 operator of Kiwi Farms that you had made no effort for
13 attorneys to have them take down the video?

14 A. I don't contest that statement. There are other parties
15 besides attorneys that could contact him to take the video
16 down, but . . .

17 Q. But you indicated that you had hired a firm to do so during
18 your testimony here today, did you not, sir?

19 A. Yes, but I testified that the person that contacted
20 Kiwi Farms was my assistant, not my law firm. The law firm
21 that I retained had a lot of experience with Kiwi Farms and
22 didn't think it would be a good idea to pursue that without an
23 actual case.

24 Q. So, instead of using legal avenues, you sent your assistant
25 to do it instead, even though you hired this New York law firm,

1 correct?

2 MR. BRETTLER: Objection, argumentative.

3 THE COURT: Overruled.

4 A. I'm sorry, could you restate the question?

5 BY MR. LAGE:

6 Q. Sure.

7 THE COURT: The question is: You used an assistant --
8 your personal assistant of yours to do this as opposed to
9 hiring a law firm.

10 THE WITNESS: I don't like the phrasing "opposed to."
11 I did use my assistant initially, yes, because the legal
12 process is slow, unfortunately, and this was a pressing issue,
13 so I contacted using the means I had available to me initially
14 and then was pursuing a legal case in the back of that.

15 BY MR. LAGE:

16 Q. Okay. And in the legal case in the back of that, did you
17 file any motions or file any pleadings to have Kiwi Farms take
18 down this video at any time?

19 A. We hadn't even been able to file the case yet before
20 Plaintiff made a public statement to file a case against me.

21 Q. Public statement. Well, have you filed anything against
22 Kiwi Farms?

23 A. Not yet, no, but -- no.

24 Q. Okay.

25 THE COURT: Did you not tell the Plaintiff when she

1 first contacted you that you would -- you would do that? What
2 did you tell the Plaintiff when she first contacted you?

3 THE WITNESS: So, if requested, I could produce an
4 exact copy of those messages, but I believe it was something
5 along the lines of: I am in contact with law firms, and I'm
6 trying to get, basically, somebody to pursue this case so that
7 I can get a strong -- basically an injunction to get this
8 material removed and it not be published on the Internet.

9 THE COURT: Okay. And did you, in fact, do that?

10 THE WITNESS: Did I do what?

11 THE COURT: What you told her, did you do that?

12 THE WITNESS: Yeah. There were a couple of law firms
13 that I went through initially that were kind of uncomfortable
14 with the subject matter of the case, and then eventually I was
15 referred to really good law firm in New York. And then I -- we
16 had basically finished and were ready to file an anonymous suit
17 against the -- that process was there, but then Plaintiff filed
18 her lawsuit and there's a -- the law firm in New York typically
19 does Plaintiff work and not defense work, and so it's kind of
20 an awkward maneuvering of that situation, if that makes sense.

21 THE COURT: Okay.

22 BY MR. LAGE:

23 Q. So, it would be fair to say that you -- as of today's date,
24 you have not filed an injunction to take down the videos
25 involving you and Pxie, correct?

1 A. Correct.

2 Q. All right. There was a lot of questioning of Ms. Doe about
3 your interactions prior to your sexual encounter and what the
4 parameters of that were going to be, correct?

5 You heard that testimony?

6 A. I heard testimony that we had a lot of conversations about
7 consent broadly, about what our sexual encounter would be. I
8 believe we did discuss that, yeah.

9 Q. All right.

10 I'm going to show you a text message between you and
11 her from 2/26/20 at 11:20 p.m., and ask you if you recognize
12 this. Do you see it, sir?

13 A. Yes. I'll say it's not a text message, it's a Discord
14 message, but I understand, yes.

15 Q. Okay.

16 And in this is Ms. Doe telling you what the parameters
17 that she's expecting of your sexual encounter and your ability
18 to discuss it or disseminate information about that sexual
19 encounter with third parties?

20 A. I'm sorry, could you restate the question?

21 Q. Sure.

22 THE COURT: What was your understanding of what this
23 message was about?

24 THE WITNESS: Yeah, so the reason why I'm
25 uncomfortable answering is this message, this conversation was,

1 I believe, occurring at a time when there were people publicly
2 fighting over who had hooked up with who. And this message
3 basically had to do with: Does anybody know that we've hooked
4 up, or did anyone know that we had a sexual encounter? This
5 isn't about explicitly transmitting material or anything like
6 that. This is just: Does anybody in our community know that
7 we hooked up before or had a sexual encounter before?

8 BY MR. LAGE:

9 Q. Well, sir, you see here where it says: Don't worry. I
10 totally trust you. And you've been very clear with how
11 seriously you take consent, and I also feel that you've been
12 very honest with me, so I trust you and your words.

13 What is that in reference to, sir?

14 A. A reference to whether or not I had been gossipping about
15 us having hooked up before.

16 Q. Well, what does consent have to do with?

17 A. Well, whether or not you would consent to me telling
18 somebody we hooked up before.

19 Q. Okay. So, she's not consenting to you telling people about
20 hooking up before. You think she's consenting implicitly or
21 giving you implied consent to share, you know, intimate videos
22 of her with you or with third parties?

23 A. I don't believe that the person who I had contacted, they
24 had no idea who the Plaintiff was. I didn't identify the
25 Plaintiff in any way, size, shape or form. This was

1 three years ago, so apparently that person didn't say anything
2 about that at the time, and nobody at the time had known that
3 we hooked up. So, insofar as me maintaining our, I guess,
4 anonymity about our sexual encounter, that seemed to be true,
5 as far as I was aware, and I said that to the best of my
6 knowledge when I messaged her, and I believe that was true.

7 Q. Prior to sharing this sexually explicit video of you and
8 Ms. Doe with Rose, did you contact Ms. Doe and ask for her
9 consent prior to sharing it?

10 A. If we had a conversation it would have been in person when
11 we recorded it.

12 Q. Okay. No subsequent conversation?

13 A. Not that I'm aware of, no.

14 Q. You were still in contact with her, though, at the time
15 that you sent the video to Rose, you were in contact with
16 Ms. Doe still, correct?

17 A. I'm not entirely sure. We were still on friends on
18 Discord, but there were times where she might have been -- I
19 think she took like a medial absence to -- I don't know if she
20 was pursuing school or relationships, so we weren't really
21 talking as regularly. It just -- but I don't recall the exact
22 dates of that.

23 Q. But you made no effort to tell her: Look, I'm thinking of
24 sharing your video with this third party, are you okay with it?

25 A. Correct.

1 Q. And you made, took no efforts to hide her identity on the
2 video, did you?

3 A. I had no reason to believe the other person knew who the
4 person was. I didn't identify her at all, so . . .

5 Q. Well, was Jane Doe's face visible on video?

6 A. Yes.

7 Q. And Jane Doe had appeared on your podcast previously or on
8 your streaming?

9 A. Quite a while ago.

10 Q. Okay. And her face was visible at that time?

11 A. Yes.

12 Q. In your streaming, have you ever stated to your audience
13 that posting explicit materials is one of the worst things you
14 can do to an individual?

15 A. It would have been with more qualifiers, but probably.

16 Q. And have you ever stated that there's no secrets in the
17 streaming world?

18 A. I imagine so, yes.

19 Q. After this lawsuit was filed, have you ever made the
20 statement while streaming: After today, her public reputation
21 will be finished?

22 A. After the lawsuit was filed?

23 Q. Correct.

24 A. Like, immediately after, or?

25 Q. Shortly after. At any time.

1 A. I don't recall.

2 Q. You've never made any kind of statement to that effect?

3 MR. BRETTLER: Objection, asked and answered.

4 THE COURT: Overruled.

5 A. I don't recall. I stream every day, eight hours a day. I
6 make a lot of statements in a lot of different areas, so . . .

7 BY MR. LAGE:

8 Q. Okay. And a lot of areas includes discussions about this
9 particular case, correct?

10 A. Correct.

11 Q. All right. And you make money off of your streams,
12 correct?

13 A. Well, yes, correct.

14 Q. So, you're actually monetizing this lawsuit by virtue of
15 the streaming that you do relating to this case, do you not?

16 A. Narrowly, yes. Broadly, no. I've lost far more than I
17 have gained from covering the public filings.

18 MR. LAGE: Just a moment, Your Honor.

19 BY MR. LAGE:

20 Q. Have you had other individuals claim that you are -- have
21 shared their videos, their sexually explicit videos without
22 their consent?

23 A. Do I need to answer that? Is that relevant to this?

24 Yes.

25 Q. How many?

1 A. I can't recall off the top of my head.

2 Q. Okay. More than five?

3 A. I don't believe so.

4 Q. Less.

5 So, other than Ms. Doe, if it's less than five, how
6 many?

7 A. The nature of my work and the nature of the world that I
8 exist in, a lot of people make a lot of claims at different
9 points in time. Some change, some come and go, so I don't want
10 to speculate.

11 Q. Okay. You met Abbymc in approximately 2023, did you not?

12 A. It sounds correct.

13 Q. All right. You had a sexual relationship with Abbymc,
14 correct?

15 A. Correct.

16 Q. All right. You're aware that Abbymc is indicating that you
17 shared the video of you and Pxie with Abbymc in 2023, correct?

18 A. I am aware of her saying that, yes.

19 THE COURT: Well, do you recall doing that?

20 THE WITNESS: No.

21 THE COURT: I'll rephrase the question. Did you,
22 in fact, share the video of the Plaintiff with this Andymc
23 person in 2023?

24 THE WITNESS: No. Like I said, I went back and I
25 dumped my messages, and I can read everything I sent to that

1 person prior, so . . .

2 BY MR. LAGE:

3 Q. Of the videos that were posted to Kiwi Farms, how many
4 videos were posted?

5 A. Unfortunately, I don't know. I think it was in excess of
6 25 plus.

7 Q. Had you had consent from all those other 24 individuals to
8 share their videos with Rose?

9 A. Twenty-four individuals?

10 Q. Those 24 individuals that you had had relationships with.

11 A. The majority of the content posted on Kiwi Farms were solo
12 videos featuring only me. I believe it was only -- I might
13 want to say sixish videos or maybe five videos, five or six
14 maybe of -- involving other people. And I don't think it's
15 five or six unique individuals, I think overall I think it was
16 three or four other individuals, so . . .

17 Q. Out of those three or four individuals, did you have
18 consent to each and every one them to post those videos?

19 A. Publicly, no. To share them with other people, I would say
20 yes.

21 Q. You would say yes?

22 A. Yes.

23 Q. Are any of those three or four individuals any of the
24 individuals that were making claims against you for having
25 shared their videos without their consent, and I'm talking

1 about other than Ms. Doe?

2 MR. BRETTLER: Objection. There are no other claims,
3 Your Honor. There's one plaintiff in this case.

4 THE COURT: I didn't understand your question.

5 Let me ask you this question: Did you post them on
6 that -- what is it called again, Kwic?

7 THE WITNESS: It's called Kiwi Farms.

8 THE COURT: Kiwi Farms. Did you post those videos?

9 THE WITNESS: Absolutely not.

10 THE COURT: Okay. Do you know who posted the videos?

11 THE WITNESS: If you'd like, I can speculate. I don't
12 know, unfortunately.

13 THE COURT: You don't know the answer.

14 THE WITNESS: I have an idea. But it was whoever had
15 access to the -- to the account that I was initially
16 conversating with. I think a different person gained access to
17 that account, scrolled up, saw a bunch of messages, and then
18 decided to -- first they tried to blackmail me, and then they
19 dumped all of the material onto Kiwi Farms.

20 THE COURT: I see.

21 BY MR. LAGE:

22 Q. However, you have directed your followers to those videos
23 on Kiwi Farms, correct?

24 A. What do you mean when you say "directed"?

25 Q. Okay. You streamed or written about the existence of those

1 videos on Kiwi Farms and indicated that the video of you and
2 Pixie is available on Kiwi Farms, correct?

3 A. I don't like the framing, but I have complained that my
4 content was still being hosted there, yes, and nothing was
5 being done about it, despite all the people talking about it,
6 yes.

7 THE COURT: Now, when is the first time that you found
8 out about this Kiwi Farm's postings?

9 THE WITNESS: I believe I was in the shower, and I
10 think I got a text message from Plaintiff.

11 THE COURT: So that November 28th or 29th event is the
12 first time you found out about it?

13 THE WITNESS: That all of my explicit material had
14 been leaked, yes.

15 THE COURT: Right, okay.

16 BY MR. LAGE:

17 Q. When you were contacted by Ms. Doe, did you in fact tell
18 her: Look, I'm sorry, there's no excuse for this?

19 A. That's part of my message to her, yes.

20 Q. All right. You've since deleted some of those messages,
21 have you not?

22 A. I've -- from Discord, yes. Although, I preserved copies of
23 them for my records.

24 Q. During one of your livestreams after this case was
25 initiated, you published Jane Doe's name, did you not?

1 A. I believe it was the same day. I think there was a filing
2 for the protective order for the -- I believe, on the 19th, I
3 think.

4 Q. So the answer is yes?

5 A. Can you restate the question?

6 Q. Yes.

7 You posted or you made available through streaming
8 Ms. Doe's real name, correct?

9 A. Her first name, yes. If I can add, after I was made aware
10 that the protective order had been filed, under advice I
11 removed the reference to her name on that YouTube video,
12 though.

13 Q. You don't have anything in writing wherein Jane Doe
14 consents to you sharing explicit material of her with you,
15 correct?

16 A. Correct. Of us to other people?

17 Q. Yes.

18 A. Correct.

19 THE COURT: Now let me ask this question: One of the
20 arguments for the motion is that based upon what has
21 transpired, there's still a risk that you're either
22 disseminating or not actively removing her videos from the
23 Internet. What's your response to that?

24 THE WITNESS: So, I think if we were to go through the
25 declarations, I think plain text reading in the declarations,

1 it's obvious that they're not referring to those videos. So
2 it's a declaration on the record by Hannah Brook where I'm
3 speaking about performing a certain sexual act. That's not a
4 video that has anything to do with the Plaintiff, although
5 they've provided that. The only evidence in the record so far,
6 there are -- there's other evidence mentioning other people,
7 but in terms of the video that's the subject matter of the
8 complaint, the only evidence in the record is with the Abbymc
9 person, and that's them claiming that I sent them two videos,
10 one person of which I've never even taken videos before with,
11 so . . .

12 THE COURT: And when did that supposedly occur?

13 THE WITNESS: I believe -- when did -- when did the
14 declarant testify that that occurred?

15 THE COURT: No, when did you supposedly send the
16 videos?

17 THE WITNESS: I think she claimed sometime in 2023.

18 THE COURT: Okay. And then in terms of the -- in
19 terms of your not doing enough to remove her video from the
20 Internet, what's your response to that?

21 THE WITNESS: So there's two parts. So, the first
22 part is that -- I don't know exactly when, but several years
23 ago, a lot of large pornographic websites like Pornhub and
24 everything, there were new federal laws that made it very
25 strict about who could upload materials onto those sites. So,

1 as a result of that, the only websites now that host explicit
2 material don't seem to respond much, unfortunately, to emails.
3 So, for one website I tried to email the website itself, then I
4 tried to email the hosting provider, like the Internet company
5 that hosts the website, and I got no response.

6 For the main distribution center, which is Kiwi Farms,
7 I said I had my assistant send a message to the owner of the
8 website. Online his name is Null. And he reposted that,
9 actually, I think a week ago making fun of me because that guy
10 has a personally bad relationship with me. So, if I -- it's
11 hard for me to -- I can't really do anything to take anything
12 down on Kiwi Farms. I have no power over any of these other
13 platforms. All I can do is file the NCA requests, and then if
14 they've got a form for revenge porn, fill that out. But all
15 the reputable online porn sites don't host stuff like that
16 anyway, unfortunately.

17 THE COURT: Any further questions?

18 MR. LAGE: Yes.

19 BY MR. LAGE:

20 Q. So you met Abbymc sometime in 2023, right?

21 A. It sounds right, yeah.

22 Q. All right. So the video would have been shared sometime in
23 2023, if that's the video you shared with her, correct?

24 MR. BRETTLER: Objection, calls for speculation. It
25 assumes facts not in evidence.

1 THE COURT: Overruled. You can answer, if you know.

2 A. Who I -- I don't actually have to speculate because I
3 believe in the declaration Abby referenced a specific date for
4 when I transmitted the video. I have my logs from that date.
5 I did not transmit the video on that date, so . . .

6 BY MR. LAGE:

7 Q. Okay. That's not my question, sir. My question to you is:
8 If there was a video transmission of the explicit video between
9 you and Ms. Doe, it makes sense that if you shared it with
10 Abbymc, it would have to be sometime in 2023, because that's
11 when you first met Abbymc, correct?

12 A. No, not necessarily. We could have transmitted it before
13 meeting each other in real life.

14 Q. Okay. But you do have record of having sent her
15 explicit --

16 THE COURT: Well, let me ask you this question: Do
17 you have a specific recollection of transmitting something,
18 some video to her?

19 THE WITNESS: I don't personally have like a specific
20 recollection mentally, but I have my logs from that.

21 THE COURT: I understand.

22 THE WITNESS: Correct, yeah.

23 THE COURT: In terms of your recollection right now,
24 you have no recollection of sending that video to her?

25 THE WITNESS: No.

1 BY MR. LAGE:

2 Q. Do you have a recollection of sending her videos that were
3 explicit in nature?

4 A. Yes.

5 Q. Now, we had talked previously about others complaining that
6 you had shared their videos without their consent. Is there an
7 individual that goes by the name of Chaiery that is -- has made
8 a complaint that you have shared her explicit video without her
9 consent?

10 MR. BRETTLER: Objection, lacks foundation, lacks
11 relevance.

12 THE COURT: Overruled.

13 How do you spell that?

14 MR. LAGE: C-H-A-I-E-R-Y. [sic] It's a screen name.

15 BY MR. LAGE:

16 Q. You can answer, sir.

17 A. I'm aware that she has made public statements like that,
18 yes.

19 Q. All right. And you have a Google Drive with the content of
20 your sexually explicit videos, correct?

21 A. Kind of, although the phrasing of that is strange. I have
22 a Google Drive; and within the Google Drive, you can create
23 explicit links to individual files. So, yes, I did not have a
24 Google Drive where it was one link to a folder full of explicit
25 material.

1 Q. Okay. And you would use that Google Drive to share
2 explicit material?

3 A. Correct, I did with Plaintiff.

4 Q. So, on this post of March 19th, 2020, is that the
5 Google Drive you're referring to?

6 A. Yes.

7 MR. LAGE: I believe I'm done, Your Honor. Let me
8 just check with counsel, and I'll tender the witness.

9 We'll tender the witness, Your Honor. Thank you.

10 THE COURT: Any redirect?

11 MR. BRETTLER: Very briefly, Your Honor.

12 REDIRECT EXAMINATION

13 BY MR. BRETTLER:

14 Q. Just a few questions for you, Mr. Bonnell.

15 Since the filing of this lawsuit, have you transmitted
16 the video of you and Pxie to anyone?

17 A. Absolutely not.

18 Q. And do you have any intention to do so?

19 A. Absolutely not.

20 Q. Well, lastly, you heard Ms. Doe claim that she suffered,
21 you know, a slew of harm as a result of the -- the conduct she
22 alleges in her complaint. Mr. Bonnell, have you suffered any
23 harm as a result of Plaintiff's conduct here and the filing of
24 her lawsuits?

25 MR. LAGE: Objection, relevance, Your Honor.

1 MR. BRETTLER: There's a balance of equities. It's
2 absolutely relevant.

3 MR. LAGE: It's not even alleged.

4 THE COURT: Overruled.

5 BY MR. BRETTLER:

6 Q. You could answer, and please --

7 A. Yes, of course, yeah.

8 Q. Can you please explain to the Court what harm you've
9 suffered as a result of the Plaintiff's conduct?

10 A. There's a direct monetary loss. There was at least one
11 decently large sponsor that canceled their engagement with me.
12 I believe it was for a low five-figure amount. And, again,
13 lost tens of thousands of subscribers on my YouTube channel. I
14 think that the revenue for that channel tanked at least 50 or
15 60,000 dollars over the course of two or three or four months.

16 Reputationally. Obviously, this is something that
17 gets dragged out a lot by everybody on the Internet.

18 Personally, it amplified all of these videos a ton and
19 now more people are posting even more of the content.
20 Sometimes people message my minor son, and they send him these
21 videos now. But, yeah, it amplified basically everything
22 related to this.

23 MR. BRETTLER: Thank you, Your Honor. Nothing
24 further.

25 THE COURT: You may step down. Thank you.

1 THE WITNESS: Thank you.

2 THE COURT: No additional witnesses, correct?

3 MR. LAGE: Correct, Your Honor.

4 THE COURT: Okay. Then let me turn to the Plaintiff
5 then tell me what -- in light of the evidence that we've now
6 gathered, what relief can I enter?

7 MR. LAGE: Your Honor, I believe that the Court is
8 empowered to grant the issuance of a temporary restraining
9 order and a preliminary injunction in regards to this case. As
10 a matter of fact, the statute that we're traveling under, the
11 federal statute CARDI contemplates it explicitly within the
12 statute itself from further dissemination of the video, from
13 posting it in any way. There is a -- in the case law, it
14 talks -- it talks about the fact that this is an ongoing and an
15 irreparable harm to the Plaintiff that that doesn't really need
16 to be proven under the case law.

17 THE COURT: What happens if there's a -- what happens
18 in a situation where the dissemination occurred long before, is
19 there an injunction in that situation? Has there been case law
20 developed under the statute relating to that situation?

21 MR. LAGE: When you mean "long before," Your Honor,
22 could you give me a scenario?

23 THE COURT: In other words, their argument is that
24 this occurred back in 2022 or 2023.

25 MR. BRETTLER: 2022.

1 THE COURT: They're disputing '23. You have evidence
2 that it had to have occurred in '23, right?

3 MR. LAGE: Correct.

4 THE COURT: So, putting that dispute aside, it either
5 occurred in '22 or '23. The question then is, though: Is
6 there any evidence of anything in the more recent time?

7 MR. LAGE: Yes, Your Honor, there is evidence of more
8 recent time because the video itself wasn't uploaded until
9 2024. Then, after this lawsuit took place, there's evidence
10 that the Defendant was talking about this on the stream, was
11 directing people to the Kiwi Farms site and to the other sites,
12 that there's reference to his Google Drives. He's never said
13 that he's deleted these images, although we've requested that
14 he'd do so. We've asked him to cooperate with Kiwi Farms.
15 He's -- despite him saying that he was wanting to take them
16 down, there was no cooperation in any way, shape or form. The
17 efforts were lacking is a very kind way of putting it. And yet
18 he has -- he says on the one hand that he wants to take them
19 down. We have a motion pending to have it taken down, and he
20 has the ability to oppose that. Just for the purposes of
21 trying to reargue this subject matter jurisdiction, which is a
22 question of fact that ultimately would have to be determined
23 either at summary judgment or a jury trial, vis-a-vis, the
24 special verdict interrogatory, if we even get to that point.

25 And, at that point, I guess, Ms. Mac would have been

1 deposed and will testify at trial, if need be. But we don't
2 have to make a showing that we are going to win for sure.
3 There just has to be a likelihood of success on the merits. I
4 think we've proven the four elements necessary for the issuance
5 of a temporary injunction or a preliminary injunction. And the
6 harm is ongoing. As long as this is on Kiwi Farms where he has
7 access to these videos, and he can post them at any time,
8 Ms. Doe is suffering irreparable harm.

9 And the case law talks about it, that as long as it
10 can be posted, there is an irreparable harm. It's presumed.
11 So, if the question is about irreparable harm, I can point
12 the Court to the Doe versus Constant case. It's 2024 Westlaw,
13 3512136 at 2. And it says: Since continuing harm via
14 continuing disclosure as contemplated by the statute,
15 injunctions are commonly granted.

16 THE COURT: Now, if I were -- what kind of injunction
17 are you asking for?

18 MR. LAGE: Well, I think we spelled it out in our
19 moving papers, but --

20 THE COURT: No, I didn't think you really did.

21 MR. LAGE: Well, we're asking that --

22 THE COURT: That's in part why I set the hearing
23 because I wasn't exactly sure -- I mean, you said it very
24 broadly. So how would you write the injunction?

25 MR. LAGE: Well, how would I write the injunction?

1 The injunction would say that Mr. Bonnell is prohibited from
2 further dissemination of the video of -- direct -- from further
3 directing people to its video until it's taken down, from
4 commenting on the video itself or the images contained in the
5 video while this case is pending.

6 THE COURT: Okay. And would it include a mandatory
7 injunction to force him to act to take down the video?

8 MR. LAGE: Your Honor, we have a motion pending for
9 that. The owner of Kiwi Farms has no objection to taking down
10 that particular video. They've opposed it arguing subject
11 matter jurisdiction. The owner does not oppose it, does not
12 oppose the entry of an order of taking it down from Kiwi Farms.
13 If there were other sites that were opposed to it, we would
14 move expeditiously to have those taken down as well. And we
15 believe that there is subject matter jurisdiction even though
16 that they dispute it.

17 THE COURT: And, yeah, and talk to me on the subject
18 matter jurisdiction, explain to that me with a little more
19 detail.

20 MR. LAGE: Well, Judge, with subject matter
21 jurisdiction, what they're trying to argue is that since the
22 original transmission with Rose took place in, they say,
23 April of 2022, and we say October 4th of 2022, that there's no
24 subject matter jurisdiction because CARDI wasn't enacted until
25 October 1st of 2022.

1 So, if it happened in April, there was no subject
2 matter jurisdiction. The injunction doesn't have to be issued
3 just by CARDII, although we believe CARDII gives an ample basis
4 for it because we cited to the Florida Statutes that prohibit
5 this as well, as well as intentional infliction of emotional
6 distress. There's other causes of action which would warrant
7 the issuance of the temporary injunction and preliminary
8 injunction in this case. But then we also turn to the issue of
9 the dissemination to Abbymc and his direction of individuals to
10 the site where it's being posted, so that's additional
11 dissemination, we believe, under the statute.

12 THE COURT: Okay. Take it a step at a time. With
13 respect to the April issue, you haven't introduced any
14 testimony differently, right? You haven't introduced any
15 evidence at this point that disputes or that directly
16 contradicts the argument that it was European time.

17 MR. LAGE: Ms. Doe testified that it was
18 October 4th --

19 THE COURT: But she has no personal knowledge of them
20 looking at what she's looking at.

21 MR. LAGE: Right, and I don't disagree that that's an
22 issue that's in dispute.

23 THE COURT: Right.

24 MR. LAGE: But --

25 THE WITNESS: So let's assume it was in April. Just

1 for the sake of argument, assume that the communication was in
2 April such that that communication falls outside the statute.
3 What -- what injunctive relief or what legal basis do you have
4 for an injunction in any event?

5 MR. LAGE: If that were the case, I would have
6 Florida Statutes, which provide for the issuance of the
7 injunction as well, Your Honor. You can issue the injunction
8 under Florida Statutes as well. And then as a basis --

9 THE COURT: And specifically which statute?

10 MR. LAGE: 784.049.

11 THE COURT: Is there any statute of limitations-type
12 problem with the statute applying?

13 MR. LAGE: I don't believe so, Your Honor. I mean, if
14 it was disseminated in 2022, a four-year statute of limitations
15 puts us at 2026, so there's no issue with that.

16 THE COURT: Right.

17 MR. LAGE: But I think even under CARDII, the Abbymc
18 declaration, it's a "he said, she said" at this point as to
19 whether or not she received the video relating directly to my
20 client or not. And I think that would form the basis under
21 CARDII.

22 We also have the statement that was made to my client
23 by the other individual that said that her video had been
24 shared two months before the filing of the lawsuit, and that's
25 in Paragraph 3, 23 of our complaint. All we have to do is show

1 competent proof. It doesn't have to be proof beyond a
2 reasonable doubt or clear and convincing evidence. It's a
3 preponderance of the evidence at this point. And given that,
4 we believe that we've put forth substantial competent evidence
5 which would give rise to the Court being able to issue the
6 injunction at this time.

7 THE COURT: And last question: You learned about the
8 Abby allegation when?

9 MR. LAGE: Your Honor, I believe that we learned about
10 it during the course of the lawsuit.

11 THE COURT: So after the lawsuit was filed?

12 MR. LAGE: Correct.

13 THE COURT: There was one issue that we've considered
14 is whether or not an injunction at this point is stale based
15 upon, A, the allegations of the complaint talking about when --
16 when the dissemination occurred.

17 B, the after knowledge by the Plaintiff of the
18 infringing activity, that no effort was made to seek injunctive
19 relief until months later. How do you respond to that?

20 MR. LAGE: Your Honor, I don't think it's stale at all
21 because the issue arose in November of 2024. That's the first
22 time that my client ever became aware that her video had been
23 shared with anyone without her consent. After that, she made
24 efforts to contact Mr. Bonnell to handle this matter amicably
25 to see if they could be taken down. Mr. Bonnell led her on,

1 told her that he was making efforts, that he hired a law firm,
2 that he hired a private investigator, and he delayed that
3 proceeding. Then the lawsuit was filed within months of that,
4 and the irreparable harm continues. The video is still
5 available, it's still being disseminated, it could be
6 disseminated at any time, and Mr. Bonnell himself could
7 disseminate that video without an injunction prohibiting him
8 from doing so.

9 Monetary damages aren't enough or a substitute for an
10 injunction under these circumstances, and the case I cited to
11 the Court, the Doe versus Constant case makes that abundantly
12 clear. So under the circumstances, I think that Your Honor is
13 well within his right to issue the injunction that we seek.

14 THE COURT: Thank you.

15 MR. LAGE: Thank you.

16 MR. BRETTLER: Thank you, Your Honor.

17 Personally, Judge Becerra already denied the TRO, so
18 Plaintiffs' counsel's argument that a TRO issue is moot,
19 the Court has denied it, finding that the TRO was stale. She
20 found out -- Plaintiff found out about these videos in April,
21 it's now June, and she's seeking a preliminary injunction.

22 THE COURT: You said April? Did you mean --

23 MR. BRETTLER: I'm sorry.

24 THE COURT: You meant November?

25 MR. BRETTLER: November of 2024. It is now June of

1 2025. The Court has already determined that there was no
2 emergency. The Court has already determined that the request
3 for a TRO is stale and so is the request for preliminary
4 injunction.

5 Where is Abbymc? Plaintiffs' counsel has represented
6 to me that she was a client of their firm. I've asked her --
7 I've asked them to accept service of a subpoena on her behalf.
8 No response. We have a hearing in court today where her
9 testimony would be critical. She is nowhere to be found. We
10 have no evidence whatsoever that this Court has jurisdiction
11 over this dispute. There is no federal question. The statute
12 that they are suing Mr. Bonnell under did not even exist at the
13 time that the video was transmitted. And this Florida Statute
14 that they're suing on for -- you know, under a theory of
15 supplemental jurisdiction because there is no diversity between
16 the parties requires malicious intent, it requires Mr. Bonnell
17 to have published the video himself onto a platform. He did no
18 such thing.

19 These two individuals are part of an online community
20 where they share sex tapes with each other, and it is not out
21 of the question that a sex tape gets leaked. And it is just
22 not something that this Court needs to be involved with in
23 terms of issuing an injunction for conduct that did not even
24 occur since the statute was enacted. You've heard from
25 Mr. Bonnell today. He was forthcoming, he was clear, he was

1 honest. You don't issue an injunction based on conduct that
2 took place months ago or what Plaintiff is afraid might happen
3 in the future when there has been no evidence of any
4 dissemination by my client personally at all on any website
5 and, secondly, since the enactment of the statute.

6 So the Court not only does not have the authority to
7 issue a preliminary injunction because it lacks subject matter
8 jurisdiction over this dispute, but even if it did have that
9 authority, even if there was a scintilla of evidence to show
10 that this video was transmitted post the enactment of the
11 statute, there is nothing -- there is no further conduct to
12 enjoin. There's no conduct to enjoin. Mr. Bonnell testified
13 he is not publishing the video, he hasn't published the video,
14 he has no intention to publish the video. He's taken measures
15 to try to remove the video that other people have published.
16 He himself is being harmed by this.

17 Why didn't Plaintiff sue Kiwi Farms? Why didn't
18 Plaintiff sue these other websites that have allegedly
19 published video? Mr. Bonnell doesn't control those sites.
20 Mr. Bonnell can't force Kiwi Farms to do anything. He can ask.
21 But Kiwi Farms is out of jurisdiction. Kiwi Farms is a
22 corporation based in Texas. They filed a motion with this
23 Court asking the Court to enjoin Kiwi Farms to take down the
24 content. But according to Plaintiff's own motion, Kiwi Farms
25 will voluntarily do so. Why do they need a court order?

1 Mr. Bonnell doesn't object to Kiwi Farms removing the content.
2 What he objects to is forcing him to pay for their injunction,
3 forcing him to pay to have the Court issue an order forcing
4 Kiwi Farms, a website he doesn't control or cooperate with, to
5 remove his content. That's what he's objecting to. He's
6 objecting to how arbitrary it is.

7 We submitted a link of, you know, 26 URLs of other
8 content that Kiwi Farms is posting in addition to this video of
9 Plaintiff and Mr. Bonnell. They absolutely refused to ask
10 Kiwi Farms to remove that content. They're focused on this one
11 little video. And if Kiwi Farms and this guy named Null wants
12 to remove the video, God bless him, we hope he does. He
13 doesn't need a court order from a district judge in Florida to
14 tell him to take down the content. He should just take it
15 down. And, you know -- and that, again, all assumes that
16 Plaintiffs can even meet their threshold showing of subject
17 matter jurisdiction here. The Court does not have the
18 authority to act in this case, period. It just doesn't. The
19 case should be dismissed. And they have had every opportunity
20 to show that subject matter jurisdiction lies, and they failed.

21 THE COURT: Why is there no diversity? Where are the
22 people from?

23 MR. BRETTLER: They're both here in Florida.

24 THE COURT: They're both Florida people.

25 MR. BRETTLER: Yes. They're both here in Florida.

1 There's no diversity jurisdiction. This is a federal question
2 case where they've tacked on state law claims that have
3 absolutely no bearing on this dispute because they have
4 different standards, they require malicious intent, they
5 require an extortion element, they require posting directly
6 onto websites. Mr. Bonnell did none of that.

7 THE COURT: Where do you get that, by the way?

8 MR. BRETTLER: In the Florida Statute?

9 THE COURT: Yeah.

10 MR. BRETTLER: We did a lot of research on Florida
11 case law that seemed to require malicious intent by the -- by
12 the defendant. Malicious intent to pose to cause harm to the
13 Plaintiff financially, et cetera. And all of the local cases,
14 the Florida State cases interpreting that statute focused on
15 the malice element. There is no malice here. There's been no
16 showing of malice, but, more importantly, there's been no
17 showing that there's been any transmission post effective date
18 of CARDII, and the case should absolutely be dismissed at this
19 early stage.

20 THE COURT: Because if you were in State Court,
21 the Court could enjoin it because he didn't post on an
22 Internet's website, but he disseminated it through electronic
23 means.

24 MR. BRETTLER: He disseminated it to Rose back before
25 the federal statute was enacted.

1 THE COURT: Right.

2 MR. BRETTLER: He did not do so with malicious intent.

3 He never identified Plaintiff by name, never identified
4 Plaintiff by screen name, never said: This is so-and-so, you
5 should -- here's a video of her. Never to cause her harm.

6 They're part of a community that enjoys sharing sex tapes with
7 each other, and they publish them online. It might not be
8 normal for us or for the general public, but it is certainly
9 normal in their community. And there was no evidence that

10 Mr. Bonnell did anything to harm Pixie, to harm the Plaintiff.

11 He, in fact, immediately expressed that he was upset, that the
12 video was published outside of his control. Clearly, there was
13 someone that hacked Rose or Rose, you know, published this
14 material on his or her own. We don't know who Rose is. But
15 it's not Mr. Bonnell that had any malicious intent to harm
16 Plaintiff. He's harmed by this. Mr. Bonnell is the one who is
17 the victim of revenge pornography here.

18 His -- you know, we heard testimony earlier today
19 about the website crashing because of Steven Bonnell's,
20 quote-unquote, blow job video. It was a completely different
21 video, a completely different video that had absolutely nothing
22 to do with the Plaintiff that crashed the Kiwi Farms site well
23 prior to this lawsuit ever being filed. It had nothing to do
24 with Plaintiff. The video that crashed the site was
25 Mr. Bonnell and another sex partner, and it got a lot more

1 views than any video that he -- you know, that ever wound up
2 being published of him and the Plaintiff. And those videos
3 that were published of him and the Plaintiff had, you know,
4 certainly did not originate from Mr. Bonnell's transmission.
5 That's the bottom line.

6 This Court doesn't have jurisdiction to enter the
7 injunction that they're requesting, and there's no conduct to
8 enjoin. There's just no more ongoing harm. Why are we here in
9 June if this allegedly caused Plaintiff to feel suicidal in
10 November? It doesn't make sense.

11 THE COURT: Do you want to reply?

12 MR. LAGE: Briefly, Your Honor.

13 As far as the staleness issue, the issue relating to a
14 temporary restraining order as opposed to a permanent
15 injunction are two different standards as far as the timeframe
16 is concerned. And the Doe versus Constant case makes that
17 abundantly clear because the permanent injunction was issued
18 months after the conduct took place. In that particular case,
19 the disclosure of the materials took place in August 2023,
20 November 2023 and January 2024. They found out, they filed the
21 lawsuit, and it wasn't until July 23, 2024, that the permanent
22 injunction was issued.

23 So, that addresses one of the issues as far as
24 staleness is concerned. And then the Court also says:
25 The Court can see no harm to Defendant in foregoing further

1 distribution or display of Plaintiff's intimate photographs.

2 On the converse, the Court can foresee a great deal of harm to
3 Plaintiff should the intimate visual images of her continue to
4 be disseminated. Accordingly, the balance of equity weighs
5 heavily in favor of an injunction. And there is no harm for
6 the public in granting the requested relief.

7 So, Your Honor, I think that this case is on all fours
8 as it relates to the -- almost the same set of facts that are
9 applicable on this particular case as far as from the timeframe
10 when our client knew or should have known that this had been
11 posted and disseminated.

12 As far as the Kiwi Farms' argument that they're
13 positing, it's just bootstrapping to their argument on subject
14 matter jurisdiction, which is more than adequately a
15 Strab-Busch through the Abbymc declaration in Paragraph 23 of
16 our complaint, even if we were to put aside the issue of
17 whether or not the initial sending of the video was in April as
18 opposed to October in this matter.

19 Accordingly, Your Honor, I --

20 THE COURT: Did you allege the Abbymc incident in the
21 complaint?

22 MR. LAGE: No, Your Honor, it wasn't part of the
23 original complaint; it's part of the evidentiary submissions in
24 this case. But we do reference Paragraph 23, which is the
25 other attempt that he made to disseminate it to another

1 individual a few months before this lawsuit was filed.

2 And, also, Your Honor --

3 THE COURT: And what evidence do I have of that? What
4 evidence do I have of that?

5 MR. LAGE: She testified as to that today as well,
6 Your Honor, that she had had contact with an individual that
7 had received the video from -- from Mr. Bonnell to her sister.
8 And hearsay is admissible in this type of proceeding, and you
9 can give it the weight that you believe is appropriate under
10 the circumstances given Mr. Bonnell's proclivities for
11 disseminating videos on a very constant basis.

12 Also, Your Honor, I think that it's important to note
13 that he had been continuing to make it accessible, vis-a-vis,
14 Google Drives. So, it's an ongoing dissemination as long as
15 it's being disseminated or accessible on his Google Drive,
16 which were posted publicly.

17 THE COURT: Hmm. Response to his argument that I
18 can't rely on the statute because there's been no evidence of
19 malice in the dissemination.

20 MR. LAGE: Your Honor, at any time that you violate
21 somebody's trust in this fashion, there is malice. He knew
22 that he didn't have the authority to disseminate it; and,
23 therefore, it's malicious. It's not -- he didn't say, oh,
24 well, I texted it by mistake. I didn't intend to send it to
25 Rose. It was, you know -- I hit the wrong button. That's not

1 anything that he's testified to. He sent it deliberately. And
2 that in and of itself is malicious when you are sharing the
3 intimate graphic details of a sexual encounter that you have no
4 right to share with a third party without the consent of the
5 other individual. I think malice is implicit in what
6 Mr. Bonnell did in this particular case.

7 THE COURT: Well, the statute says that you have to
8 disseminate through electronic means --

9 MR. LAGE: He texted it.

10 THE COURT: -- a sexually explicit image of a person
11 that conveys the personal identification information of the
12 depicted person. What does that mean?

13 MR. LAGE: Your Honor, I think it's: Can the person
14 be identified as a result of the video that's been
15 disseminated? The case law isn't clear on that, but what we do
16 know is that numerous people, even the testimony from Ms. Doe
17 is abundantly clear that everybody could identify who she was,
18 and they were posting about it, they were texting her about it,
19 they were DMing her about it. So it's clear that it was her.
20 So, I think that's sufficient to meet the criteria under the
21 statute.

22 THE COURT: And then the next provision says: With
23 the intent of causing substantial emotional distress to the
24 depicted person.

25 MR. LAGE: Your Honor, so, whenever you do that, you

1 know that the possibility -- well, not just the possibility,
2 that it will cause distress to the other person if that does
3 come out. And we have the testimony of Mr. Bonnell himself who
4 says that there's no secrets on the Internet, okay? And he
5 also had said that posting without somebody's consent is one of
6 the worst things that you can do. And implicitly it's because
7 we all know that that's going to live in cyberspace in some
8 form or another for eternity, and that that's going to cause
9 distress of that particular individual.

10 THE COURT: Well, I guess their defense is that his,
11 quote-unquote, community that she participated in are basically
12 people who routinely do this; and so, therefore, even assuming
13 that he made a mistake about what he believed to be her
14 consent, let's assume that, he didn't do it with the intent of
15 causing her distress, because he thought that she was part of
16 his community.

17 MR. LAGE: The problem is, is the Internet isn't
18 relegated to just his community. The Internet is the public at
19 large, so --

20 THE COURT: But he didn't post it on the Internet. He
21 sent a text message.

22 MR. LAGE: I understand, but --

23 THE COURT: Because it would be different if he posted
24 it on say a Substack, right?

25 MR. LAGE: Well, he has --

1 THE COURT: But if he sends a text message to an
2 individual, and then that individual either disseminates it
3 without his consent or gets hacked, the question is: Is that
4 what the statute is going at? In other words, is that -- is
5 that what -- why you would have a -- if you post that on an
6 online community knowing that millions of people or thousands
7 of people are going to see it, malice can be presumed at least,
8 right? At least in the initial stages. But in a situation
9 like this, how do I do that?

10 MR. LAGE: Well, Your Honor, there was no caveat
11 whatsoever that Mr. Bonnell had placed on the dissemination of
12 that video with Rose. He didn't say this can't be shared, this
13 can't be posted.

14 THE COURT: Even he did, it wouldn't have mattered
15 because if it is true that she was hacked, right, this other
16 person, Rose, any of those disclaimers, any of those caveats
17 would have been irrelevant.

18 MR. LAGE: And that's what we're assuming based on his
19 testimony is that they were hacked. We don't have any
20 evidence --

21 THE COURT: Right. We don't have any evidence of it,
22 right?

23 MR. LAGE: Of that at this time.

24 THE COURT: Right.

25 MR. LAGE: What we do know is that he disseminated the

1 video without consent, that he knows that that in and of
2 itself, that person can do whatever they want with that
3 particular video. They can send it to everybody in their group
4 chat, they can post it online, they can do whatever they want
5 with it.

6 And in and of itself, knowing that that could happen,
7 knowing that, as he says, nothing is secret in the streaming
8 world, per se, he knew that this was reasonably foreseeable and
9 highly likely that at some point this was going to get out, and
10 he had no regard for it. And he's had no regard for it at any
11 time for the sharing of any of these videos.

12 THE COURT: But if that were true, then she's guilty
13 of cyber harassing because she sent a video of her former
14 boyfriend. So if it was true that simply putting it out there
15 is sufficient, right, because you -- once you disseminate, bad
16 things can happen, then she would be guilty of it. She may not
17 have had any intention of causing substantial harm or emotional
18 distress to her former boyfriend because she assumed she had
19 consent, but she clearly disseminated it. So how is that any
20 different?

21 MR. LAGE: The difference is this, Judge. I think it
22 may have been lost in her testimony, but she had consent from
23 her boyfriend to disseminate that video. So he knew what he
24 was facing, what the reasonable foreseeable consequences of
25 that were, and what could happen with that particular video,

1 and he consented to it. The difference here is she did not
2 consent dissemination of the video that she made with
3 Mr. Bonnell, and that is the crux of the difference in the two
4 scenarios.

5 THE COURT: Sure, because if in fact she didn't
6 consent, then it makes a difference. The question though for
7 me is, for purposes -- that's a different issue. If she didn't
8 consent, and he violated their trust, then, number one, you
9 have a contractual arrangement, theoretically.

10 Number two, you have at least a negligent infliction
11 of emotional distress. This statute seems to require me to
12 find that at the time of dissemination, he did so with the
13 intent of causing harm to the depicted person. So, can I -- do
14 I have enough evidence at this point to make that finding?

15 MR. LAGE: Yes, Your Honor, because I think it's
16 reasonably foreseeable, and he had the intent of disseminating
17 it. So he knew that -- first of all, he barely knows this
18 person. He doesn't know Rose from a hole in the wall is
19 basically what he's saying to Your Honor. He'd known her a
20 couple of months, talked to her on DM and -- well, here's this
21 private information about an individual that you know nothing
22 about, do with it what you will, there's no parameters to it
23 whatsoever, and, you know, he's using it to entice her maybe
24 into the next sexual encounter.

25 But be that as it may, he has a habit of doing this,

1 Your Honor. It's not the first and the last time that he's
2 done it. So, I think that the malice is there, and I showed
3 Your Honor the text messages leading up to the encounter where
4 she indicates that she doesn't want anyone to know that they're
5 engaged in a sexual relationship of any sort at the time, and
6 that she trusts him, and that he understands what consent
7 means. He tries to spin it in a different direction, but I
8 think it's abundantly clear what the purpose of that -- of that
9 text was or what that purpose of that Discord -- Discord post
10 was at the time that it was sent to him. The fact that he now
11 wants to say, well, I thought I had implicit or some type of
12 implied consent flies in the face of what he received.

13 So, I think under the circumstances you have any
14 number of ways that Your Honor is empowered to grant the
15 temporary -- the permanent injunction in regards to this
16 particular case.

17 THE COURT: Okay. All right. So I will take all of
18 that under advisement and issue out a ruling soon.

19 MR. LAGE: Thank you, Your Honor.

20 MR. BRETTLER: Thank you, Your Honor.

21 THE COURT: Now, I will say this, I'm not going to ask
22 for it, there is some intersection between what we're dealing
23 with and what is happening since because, for example, say I
24 was going to -- say I wanted to grant the injunction, and I
25 felt I had a beat basis to and that all the elements were met,

1 theoretically that would include potentially mandatory
2 injunctive relief, but that's relevant also to the pending
3 motion on the Kiwi Farms thing. So, there may be some overlap
4 there. So I may have to -- I may consult with Judge Becerra
5 about how we should handle that to be more efficient on our
6 end. But I will take it a step at a time first. Because,
7 obviously, if I would intend- -- If I conclude I can't grant
8 the injunction legally, then there's no overlap. At that
9 point, then the other issue still needs to be taken up on its
10 merits.

11 MR. BRETTLER: If they want to add Kiwi Farms to the
12 lawsuit, that's their prerogative, but right now the only
13 motion is for an injunction against Mr. Bonnell, and we've
14 demonstrated that they haven't met their burden. Thank you,
15 Your Honor.

16 THE COURT: Thank you.

17 THE DEPUTY CLERK: All rise.
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C E R T I F I C A T E

I hereby certify that the foregoing is an accurate transcription to the best of my ability of the digital audio recording in the above-entitled matter.

June 6, 2025

/s/ Gina Rodriguez
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